

70305-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Blvd.
Clifton, NJ 07015

JAN 31 2006

Dear Mr. McCreary:

Subject: Revised Basic Confidential Statement of Formula
Cedar Scented Para Moth Balls
EPA Registration No. 70305-2
Submission Date: January 13, 2006

The Agency has reviewed your submission for a revised Confidential Statement of Formula, and the following comment applies:

The Confidential Statement of Formula dated January 13, 2006 for the basic formulation agrees with the label claim in compliance with PR Notice 91-2 and is acceptable.

The Confidential Statement of Formula has been added to your file as part of the record. If you have any questions concerning this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Note To File

**The revised basic Confidential Statement of
Formula dated January 13, 2006 was
reviewed and accepted by Kable Bo Davis on
January 31, 2006.**

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (973) 591-0777
Fax: (973) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Daniel C. Kenny, Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)
Office of Pesticides Programs
USEPA Crystal Mall 2
1921 Jefferson Davis Highway
Arlington, VA 22202

January 13, 2006

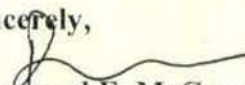
Subject: Revised Confidential Statement of Formula for:
Para Moth Balls, EPA Registration No. 70305-1,
Cedar Scented Para Moth Balls, EPA Registration No. 70305-2,
Para Moth Flakes, EPA Registration No. 70305-3.

Dear Mr. Kenny,

This is in response to your letters dated December 20, 2005 requesting submission within 30 days of revised Confidential Statement of Formula (CSF) for our three pesticide product above referenced. Specifically you requested, that due to voluntary cancellation of the registration of the active ingredient para-dichlorobenzene [REDACTED] as source for our basic formulations, we must use a new source product to replace that which was cancelled.

Please be advised that we have made arrangements with [REDACTED] to use their registered source product of technical grade active ingredient for our products. The new source product has the registration number [REDACTED]. To this end, please find enclosed revised CSFs for the products EPA Registration Numbers 70305-1, 70305-2, and 70305-3. Should there be any questions regarding this matters, please do not hesitate to call me at 973-591-0777.

Sincerely,


Raymond E. McCreary, President
Paragon Household Products, Inc.

Enclosures

Product ingredient source information may be entitled to confidential treatment



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

<p style="text-align: center;">United States Environmental Protection Agency Washington, DC 20460</p>	<div style="border: 1px solid black; padding: 2px;"> <input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other </div>	OPP Identifier Number _____
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Application for Pesticide - Section I

1. Company/Product Number 70305-2	2. EPA Product Manager Daniel C. Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CEDAR SCENTED PARA MOTH BALLS	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products, Inc. P.O. Box 2169 233 Clifton Blvd. Clifton, N.J. 07015 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated Dec. 20, 2005 <input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revised CSF

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/> _____	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Other _____ <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Raymond E. McCreary	Title President	Telephone No. (Include Area Code) 973-591-0777
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		8. Date Application Received (Stamped) <div style="text-align: center;"> </div>
2. Signature 	3. Title President	<div style="text-align: center;"> </div>
4. Typed Name Raymond E. McCreary	5. Date January 13, 2006	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Blvd.
Clifton, NJ 07015

OCT 27 2005

Dear Mr. McCreary:

Subject: Labeling Amendment; Response to PR-Notice 2001-1
Para Moth Balls Cedar Scented
EPA Registration No. 70305-2
Submission Date: September 7, 2005

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415.

Sincerely yours,

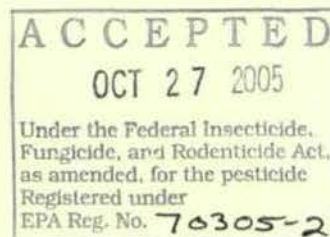
Daniel C. Kenny
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505C)

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para
Moth Balls
Cedar Scented**

**KILLS MOTHS AND
CARPET BEETLES**



NET WT.10 oz (283.5 g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.9%

INERT INGREDIENTS: 0.1%
TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

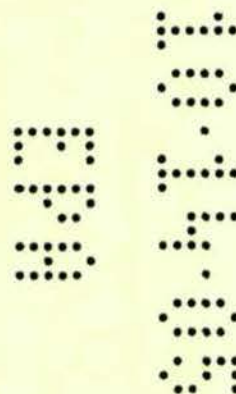
**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para Moth
Balls
Cedar Scented**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the

following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015**



Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

 United States Environmental Protection Agency Washington, DC 20460		<input type="checkbox"/> Registration <input checked="" type="checkbox"/> Amendment <input type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide - Section I			
1. Company/Product Number 70305/70305-2		2. EPA Product Manager Dan Kenny	
4. Company/Product (Name) Para Moth Balls Cedar Scented		3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products Inc. P.O.ox 2169, 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section - II			
<input checked="" type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Final printed labels in response to Agency letter dated _____			
<input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application.			
<input type="checkbox"/> Notification - Explain below. <input type="checkbox"/> Other - Explain below.			
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Response to PR Notice 2001-1			
Section - III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt No. per container	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 5 & 10 oz	
5. Location of Label Directions <input checked="" type="checkbox"/>		6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	
Section - IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Raymond E. McCreary		Title President	
		Telephone No. (Include Area Code) 973-591-0777	
2. Signature 		3. Title President	
4. Typed Name Raymond E. McCreary		5. Date September 7, 2005	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped) 	

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (973) 591-0777
Fax: (973) 591-0770

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Document Processing Desk (AMEND)
Office of Pesticides Programs (7504-C)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460-0001

RE: Label Amendment Applications

Dear Sir/Madam,

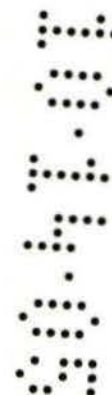
Please find enclosed label amendment applications (EPA Form 8570-1) for our products "Para Moth Balls" EPA Reg. No. 70305-1, "Para Moth Balls Cedar Scented" EPA Reg. No. 70305-2, and "Para Moth Flakes" EPA Reg. No. 70305-3. These amendments are in response to PR Notice 2001-1, revising the First Aid Statements. Please also find enclosed five (5) copies of draft labels for each product. I trust these revisions are in accordance with the provisions of the above-mentioned PR Notice.

Thank you for your time and consideration. Should there be any questions, please contact me at 973-591-0777.

Sincerely,

Raymond E. McCreary, President
Paragon Household Products Inc.

Enclosures





United States
Environmental Protection Agency
Washington, DC 20460
EXPEDITED REVIEW

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

250716

Application for Pesticide - Section I

1. Company/Product Number 70305-2	2. EPA Product Manager Daniel B. Peacock	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) (1) PARA MOTH BALLS CEDAR SCENTED; (2) CEDAR MOTH BLOCK; (3) CEDAR CLOSET CAKE.		
5. Name and Address of Applicant (Include ZIP Code) PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 70305-1 Product Name PARA MOTH BALLS

Section - II

NOTIFICATION

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated
<input type="checkbox"/> Resubmission in response to Agency letter dated	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

OCT 26 1998

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Notification of Alternate Brand Names per PR Notice 95-2. This Notification is consistent with the provisions of the PR Notice 95-2 and EPA Regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further

See attached --

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify)	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 5 to 15 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Raymond E. McCreary		Title President		Telephone No. (Include Area Code) 973-591-0777	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment of both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title President			
4. Typed Name Raymond E. McCreary		5. Date 10/15/98			

US ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDES PROGRAMS
REGISTRATION DIVISION (TS-767)
WASHINGTON, DC 20460

EPA REGISTRATION NO.

70305-2

DATE OF ISSUANCE

DEC 3 1997

TERM OF ISSUANCE

NOTICE OF PESTICIDE:

☒ REGISTRATION
☐ REREISTRATION

(Under the Federal Insecticide, Fungicide,
and Rodenticide Act, as amended)

NAME OF PESTICIDE PRODUCT

Para Moth Balls Cedar
Scented

NAME AND ADDRESS OF REGISTRANT (Include ZIP code)

Paragon Household Products, Inc.
233 Clifton Blvd.
Clifton, NJ 07015

Attention: Mr. Raymond E. McCreary

5-534 204 16/18

NOTE: Changes in labeling formula differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above U.S. EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby Registered/Reregistered under the Federal Insecticide, Fungicide, and Rodenticide Act.

A copy of the labeling accepted in connection with this Registration/Reregistration is returned herewith.

Registration is in no way to be construed as an indorsement or approval of this product by this Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

- A. Submit and/or cite all data required for registration/ reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
- B. Make the labeling changes listed below before you release the product for shipment:
 1. Add the phrase, "EPA Registration No. 70305-2"



ATTACHMENT IS APPLICABLE

SIGNATURE OF APPROVING OFFICIAL

DATE

- C. Submit one copy of your final printed labeling before you release the product for shipment. Refer to the A-79 Enclosure for a further description of final printed labeling.

This registration will be subject to cancellation in accordance with FIFRA sec. 6(e) if you do not comply with these conditions. Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures: 1) Stamped label
2) A-79 Enclosure

Peacock WP#14:A:\PDB\70305-2.NOT:305-5407:11/26/97

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth Balls
Cedar Scented

ACCEPTED
with COMMENTS
in EPA Letter Dated:

DEC 3 1997

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

TO KILL CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES
IN AIR-TIGHT CONTAINERS AND STORAGE CLOSETS

70305-2

ACTIVE INGREDIENT:

Paradichlorobenzene..... 99.9%

INERT INGREDIENTS:..... 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN
WARNING
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth
Balls

KILLS CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC
233 CLIFTON BLVD
CLIFTON, NJ 07015

Back Panel**PRECAUTIONARY STATEMENTS****Hazards to Humans and Domestic Animals****WARNING**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. If symptoms persist, get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
-------------------	--------------------------------

1/4	Average Garment Bag
-----	---------------------

1/3
1Large Trunk
50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015

TOTAL P.03



United States
Environmental Protection Agency
Washington, DC 20460

Form Approved
OMB No. 2070-0060
Approval Expires 05-31-95

Certification with Respect to Citation of Data

Applicants Name and Address

PARAGON HOUSEHOLD PRODUCTS, INC.
P.O. Box 2169 233 Clifton Blvd.
Clifton, NJ 07015

EPA File Symbol/Registration Number

70305-R

Product Name CEDAR SCENTED PARA MOTH BALLS

Date of Application 2/6/97

NOTE: If your product is a 100% repackaging of another EPA-registered product that you purchase, and is labeled for the same uses, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product that is identical or substantially similar and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application. (Check the appropriate boxes, in items 2 and 3, or 4 below that pertain to your application.)

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study.

☐ I am the original submitter*; or

☐ I have obtained the written permission of the original submitter for _____, which is
(insert name of chemical)
(for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study;

a. ☒ I am the original data submitter*; or

☐ I have obtained the written permission of the original data submitter for _____, which is
(insert name of chemical)
(for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*; or

b. ☐ I have notified in writing the companies _____ for _____ that
(insert names of companies) (insert name of chemical)

have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(F) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA); and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are:

Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all
method or cite-all option under Selective Method*). (Also, sign the General Offer Statement below.)
Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
that have submitted the studies which I have cited (Selective method*).

4. ☐ I certify that for each study cited in support of this application I am not required to offer data compensation or obtain written permission because all time periods for exclusive use and data compensation have expired.

* A Data Matrix identifying these studies is attached. (Note: a Data Matrix is not required under the cite-all method)

Signature	Name and Title Raymond E. McCreary, Pres.	Date 2/6/97
General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required.		
Signature	Name and Title	Date

TO: DANIEL PEACOCK
10 PAGES + COVER

11/25/97



FROM: R. McCreary
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Paragon Household Products, Inc.
233 Clifton Blvd.
Clifton, NJ 07015

NOV 21 1997

Attention: Mr. Raymond E. McCreary

OFFICE OF
PESTICIDES AND TOXIC
SUBSTANCES

Subject: Para Moth Balls Cedar Scented
EPA File Symbol 70305-E
Your application of March 6, 1997

We have completed our review of the above application and have the following comments about the forms, data, and labeling needed to register this product.

I. Forms

A. Certification Statement

REVISED

Resubmit this form, checking off "3A" instead of "2A", which only applies for "exclusive use" active ingredients.

II. Data

The product chemistry data are acceptable.

III. Labeling

3 NEW COPIES

Revise your labeling in accordance with the enclosed format label and resubmit three (3) copies of revised, draft labeling.

Please note that the Insecticide-Rodenticide Branch is now handling products with the active ingredient in this product. If you have questions about this letter, you may reach me by phone (703-305-5407, fax (703-305-6596), or E-Mail (peacock.dan@epamail.epa.gov).

Sincerely,

Daniel B. Peacock

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure: Format Label: PDB End-Use
(clothes moth & carpet beetles)

Paragon Household Products, Inc.
233 Clifton Blvd.
Clifton, NJ 07015

NOV 21 1997

16/ 5-528736
12

Attention: Mr. Raymond E. McCreary

Subject: Para Moth Balls Cedar Scented
EPA File Symbol 70305-E
Your application of March 6, 1997

We have completed our review of the above application and have the following comments about the forms, data, and labeling needed to register this product.

I. Forms

A. Certification Statement

Resubmit this form, checking off "3A" instead of "2A", which only applies for "exclusive use" active ingredients.

II. Data

The product chemistry data are acceptable.

III. Labeling

Revise your labeling in accordance with the enclosed format label and resubmit three (3) copies of revised, draft labeling.

Please note that the Insecticide-Rodenticide Branch is now handling products with the active ingredient in this product. If you have questions about this letter, you may reach me by phone (703-305-5407, fax (703-305-6596), or E-Mail (peacock.dan@epamail.epa.gov).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosure: Format Label: PDB End-Use
(clothes moth & carpet beetles)

Peacock WP#14:A:\PDB\70305-E.Not:305-5407,-6600:11/20/97

[FORMAT LABEL: PDB
END-USE PRODUCTS FOR
CONTROL OF CLOTHES MOTH AND CARPET BEETLES, November 21, 1997]

[FRONT PANEL]

[PRODUCT NAME]

To Kill Clothes Moths (Larvae and Adults) and Carpet Beetles
in Air-Tight Containers and Storage Closets

ACTIVE INGREDIENT:

Paradichlorobenzene 99.9%

INERT INGREDIENTS:1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

See Left/Right/Side Panel for additional precautionary
statements.

NET WEIGHT ____lb.

PRECAUTIONARY STATEMENTS

WARNING

FIRST AID

Probable mucosal damage may contraindicate the use of gastric lavage.

[FORMAT LABEL: PDB 3 END-USE PRODUCTS FOR
CONTROL OF CLOTHES MOTH AND CARPET BEETLES, November 21, 1997]

[LEFT, RIGHT, OR SIDE PANEL]

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool, dry place inaccessible to children and pets.

Disposal: Do not reuse empty container [or packaging]. Securely wrap in newspaper and discard in trash.

EPA Registration No. _____

EPA Establishment No. _____

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g., chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

November 20, 1997

MEMORANDUM

SUBJECT: Correct Precautionary Labeling for Paradichlorobenzene Products

FROM: *D. B. Peacock*
Dan Peacock, Biologist
Insecticide-Rodenticide Branch (7505C)

TO: Paradichlorobenzene Products

~~In a March 22, 1994, I discussed the correctness of the precautionary labeling statements for a then pending product, Varpel Rope, a product containing technical grade (>99% active) Paradichlorobenzene (PDB) enclosed in a type of "paper".~~ Before registering this product, I researched the status of the acute toxicity data submitted for technical PDB to support its continued registration. In March 1994, the Agency had reviewed acceptable acute oral and acute dermal toxicity tests resulting from a 1988 Data Call-In (DCI). In my memorandum, I pointed out that the other four acute toxicity tests were under review. In a later (July 18, 1994) letter, the Special Review and Reregistration Division (SRRD) informed a Monsanto representative that these tests were also acceptable. These tests showed that technical grade PDB product should have a signal word of "WARNING" and that such products should be in the following toxicity categories, depending on the type of test:

<u>Name of Test (Guideline No.)</u>	<u>MRID No.</u>	<u>Toxicity Category</u>	<u>Source of Information</u>
Acute Oral (81-1)	405210-01	III	<i>Tox 1-liner</i>
Acute Dermal (81-2)	405680-04	III	<i>Tox 1-liner</i>
Acute Inhalation (81-3)	414109-01	IV	<i>7/18/94 SRRD ltr</i>
Primary Eye Irr (81-4)	422053-01	II	<i>//</i>
Primary Dermal Irr (81-5)	422053-02	III	<i>//</i>
Dermal Sensitization (81-6)	422053-03	not a sensitizer	<i>//</i>

70305-E
(gasket copy)

[FORMAT LABEL: PDB PRODUCT
BEETLES

CLOTHES MOTH AND CARPET
November 20, 1997]

[FRONT PANEL]

[PRODUCT NAME]

To Kill Clothes Moths (Larvae and Adults) and Carpet Beetles
in Air-Tight Containers and Storage Closets

ACTIVE INGREDIENT:

Paradichlorobenzene 99.9%

INERT INGREDIENTS:1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

See Left/Right/Side Panel for additional precautionary
statements.

NET WEIGHT ____lb.

[FORMAT LABEL: PDB PRODUCT 2 CLOTHES MOTH AND CARPET
BEETLES November 20, 1997]

[LEFT, RIGHT, or BACK PANEL]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through the skin. Causes eye, skin, and respiratory tract irritation. Wear safety glasses. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF IN EYES: Flush with plenty of water for 15 minutes. Get medical attention. Remove material from skin and clothing.

IF SWALLOWED: Drink a large quantity of water. Do not induce vomiting. Avoid alcohol. Get medical attention.

IF ON SKIN: Flush with plenty of water. Remove contaminated clothing. Wash clothing before reuse.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

[See 40 CFR 156.10(h)(2) for additional details about proper placement of precautionary text.]

[FORMAT LABEL: PDB PRODUCT 3 CLOTHES MOTH AND CARPET
BEETLES November 20, 1997]

[LEFT, RIGHT, OR SIDE PANEL]

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool, dry place inaccessible to children and pets.

Disposal: Do not reuse empty container [or packaging]. Securely wrap in newspaper and discard in trash.

EPA Registration No. _____

EPA Establishment No. _____

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g., chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

[FORMAT LABEL: PDB PRODUCT 4 CLOTHES MOTH AND CARPET
BEETLES November 20, 1997]

[LEFT, RIGHT, OR BACK PANEL]

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

Peacock WP#14:A:\PDB\Format.LB1:305-5407,-6600:11/20/97



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUL 25 1994

JUL 18 1994

CERTIFIED MAIL

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Randall M. Stone, Esq.
Paul, Hastings, Janofsky and Walker
1050 Connecticut Ave. N.W.
Washington, D.C. 20036-5331

SUBJECT: Review of Toxicity Data for Paradichlorobenzene, Case#
3058, AI# 61501.

Dear Mr. Stone:

This letter responds to your data submissions (MRID#s 41410901, 42205301, 42205302 and 42205303) supporting the reregistration of paradichlorobenzene pertaining to guidelines (GDLNs) 81-3, 81-4, 81-5, and 81-6. The data have been reviewed and the Agency's decision is as follows:

GDLN 81-3 Acute Inhalation Toxicity-Rat, MRID# 41410901:

This study satisfies the data requirement for GDLN 81-3. No additional data are required. The results of this study indicate that the acute inhalation LC_{50} was ≥ 6.0 mg/kg for both sexes, and the Toxicity Category is IV.

GDLN 81-4 Primary Eye Irritation Study-Rabbits, MRID# 42205301:

This study satisfies the data requirement for GDLN 81-4. No additional data are required. The maximum total irritation scores for the test animals ranged from 20 to 47 indicating a moderate eye irritant and a Toxicity Category of II.

GDLN 81-5 Primary Skin Irritation-Rabbits, MRID# 42205302:

This study satisfies the data requirement for GDLN 81-5. No additional data are required. The primary irritation index (PII), based on erythema and edema scores, was determined to be = 2.9, and the Toxicity Category is III.



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30 paper that

GDLN 81-6 Delayed Contact Hypersensitivity Study, Guinea Pigs,
MRID# 42205303:

This study satisfies the data requirement for GDLN 81-6. No additional data are required. The incidence of \pm [slight, patchy erythema] responses in the test group was compared to the control group. Responses in both groups were comparable and indicate that sensitization did not occur.

I have enclosed a copy of each Data Evaluation Reports for your information. If you have any questions regarding this letter, please call Ron Kendall in the Accelerated Reregistration Branch at (703) 308-8068.

Sincerely,

Virginia W. Dietrich

Virginia W. Dietrich, Acting Section Chief
Accelerated Reregistration Branch
Special Review and
Reregistration Division

enclosures: Data Evaluation Reports

cc: Monsanto Agricultural Co.
Standard Chlorine Chemical Co.
SanYvette Williams-Foy, HED/TBII
~~Marshal Swindell, PM 32~~



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

524-283

March 22, 1994

MEMORANDUM

SUBJECT: Varpel Rope
EPA File Symbol 63123-R
Issues to Resolve Before Registration

FROM: Dan Peacock, Biologist
PM Team *DP*

TO: Registration File

In this memorandum I discuss two issues (identity of inerts and correctness of precautionary statements) that emerged prior to registration and how I resolved them.

A. Identity of inerts

1. Discussion of Issue

Our 10/15/93 letter required the registrant to identify the composition of the third ingredient on the 7/30/93 Confidential Statement of Formula (CSF). Their supplier, [REDACTED] sent us a sheet listing the [REDACTED]

[REDACTED] used to make this product.

A review of the [REDACTED] components used to make this product, found on [REDACTED] Confidential Attachment A, revealed that [REDACTED] do not appear in the inerts list under the names provided from [REDACTED]

1. [REDACTED]
2. [REDACTED]

To resolve this issue, we could do one of the following:

1. require supplier to identify the [REDACTED] unknown starting materials,
2. code the product as [REDACTED]

Product ingredient source information may be entitled to confidential treatment

Inert ingredient information may be entitled to confidential treatment



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at least 75% recycled fiber

On March 21, 1994, I talked to Ruth Douglas, PM 32. She said that she did not have a review for the PDB eye irritation study. She just accepted, at face value, Monsanto's MRID citation and assertion that the signal word should now be DANGER.

According to James E. Downes of Monsanto, who had requested the labeling change from WARNING to DANGER in his July 30, 1992, letter, he did not have in his possession an EPA toxicity review of the eye study or a letter from EPA saying that the study was acceptable.

In order to find out the correct signal word and precautionary statements, I contacted Ron Kendall (308-8068), Case Review Manager for the reregistration of Paradichlorobenzene (PDB) in our Special Review and Reregistration Division (SRRD). According to his records, which are found in the Chemical Review Management System (CRMS), the status of the acute toxicity data base for PDB, as later amended by the Tox Oneliners, is as follows:

Guideline	Requested	MRID	Status
81-1	1988 DCI	405210-01	Accepted (Toxicity Category 3)
81-2	1988 DCI	405210-01 or 405680-01	Accepted (Toxicity Category 3)
81-3	Phase 4	414109-01	Currently under review
81-4	Phase 4	422053-01	Currently under review
81-5	Phase 4	422053-02	Currently under review
81-6	Phase 4	422053-03	Currently under review

2. Recommendation to Resolve Issue

Since Monsanto made the requested change in the signal word from WARNING to DANGER on the apparent misunderstanding of the criteria that the Agency currently uses to assign signal words and associated precautionary labeling, I would recommend the following actions:

- a. Use the following as a basis for the precautionary text for the registration of Varpel Rope:
 - 1) Oral Hazard, Toxicity Category 3
 - 2) Dermal Hazard, Toxicity Category 3
 - 3) Inhalation Hazard, text on EPA Reg. No. 524-283

- 4) Eye Irritation Hazard, Toxicity Category 2 and text on 524-283
 - 5) Skin Irritation Hazard, text on 524-283
 - 6) Dermal Sensitization Hazard, text on 524=283
- b. Inform Varpel in the Notice of Registration that changes in their precautionary statements may be required in the future, after the Agency completes its review of acute toxicity data on their source product.
- c. Inform the 6(a)(2) Adverse Data group that the eye irritation and three other acute studies should be put into the system at once to determine if changes in the precautionary statements are needed for affected products.

Peacock WP#4:A:63123.R:305-5407,-6600:3/22/94

ROUTING AND TRANSMITTAL SLIP

Date 3-22-94

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. <u>Ron Kendall, CRM</u>		
2. <u>PDB</u>		
3.		
4.		
5.		

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	<u>4</u> For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS Attached is a copy of the Tox oneliner for PDB
George Watmore, CHED contractor, printed it out for me.
On Page 6, which summarizes the acute tox data, you will see that the acute oral (MRID 405310-01) & acute dermal (MRID 405680-01) are ~~in~~ acceptable. Both are tox cat 3 (CAUTION) for these exposure routes.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<u>Dan Pearson</u>	<u>221, CM 2</u>
	Phone No.
	<u>305-5407</u>

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
 Prescribed by GSA
 FPMR (41 CFR) 101-11.206

P.S. Note: They have different MRID for 81-2 than you have.

**U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDES/HED/TB-1
TOX ONELINERS**

**PAGE 6
CASWELL#: 632
CAS-REG#: 106-4**

P.C. CODE 061501- Paradichlorobenzene

FILE LAST PRINTED: 03/22/94

CITATION	MATERIAL	ACCESSION/ MRID NO.	RESULTS	TOX CAT	COREGRADE/ DOCUMENT#
81-1 Acute oral LD50 Species: rat Fund'tal Appl Tox 7:1986 Gaines and Linder; 1986	p-Dichlorobenzene	405210-01	LD50 = 3863 mg/kg (95% CL = 3561 - 4153 mg/kg) for male Sherman rats LD50 = 3790 mg/kg (95% CL = 3425 - 4277 mg/kg) for female Sherman rats.	3	Minimum 007021
81-1 Acute oral LD50 Species: rat Younger Labs Inc. Y-75-300; 12/75	p-Dichlorobenzene	405680-04	LD50 = 1860 mg/kg (95% CL = 1690 - 2050 mg/kg) for M & F rats combin ed. Only 2 to 3 rats used/dose level.	3	Supplementary 007021
81-2 Acute Dermal LD50 Species: rat Fund'tal Appl Tox 7: 1986 Gaines and Linder; 1986	p-Dichlorobenzene	405680-01	LD50 > 6000 mg/kg in male and female Sherman rats.	3	Minimum 007021
81-2 Acute Dermal LD50 Species: rabbit Younger Labs Inc. Y-75-300; 12/75	p-Dichlorobenzene	405680-04	LD50 > 5010 mg/kg for males and females combined. Only 1 animal used /dose/sex.	3	Supplementary 007021
81-2 Acute Dermal LD50 Species: rabbit	Paradichlorobenzene tech		Data waived		007023
81-4 Primary eye irritation Species: rabbit Younger Labs Inc. Y-75-300; 12/75	p-Dichlorobenzene	405680-04	PIS = 13.7; slight eye irritant (purity of p-DCB used not specified)	3	Supplementary 007021
81-5 Primary dermal irritation Species: rabbit Younger Labs Inc. Y-75-300; 12/75	p-Dichlorobenzene	405680-04	PIS = 1.0 ; mild skin irritant (purity of p-DCB used not specified)	4	Supplementary 007021

IRB/TSS Precautionary Labeling Review

December 18, 1984

TO: PM-16

SUBJECT: 524-283

Santochlor Crushed
Monsanto Company, St. Louis
St. Louis, MI 63166

In TSS: 09-13-84

Record No.: 129013

Action: 300

initials received #

Formulation: Technical.

Active Ingredient:

P-dichlorobenzene..... 100%

BACKGROUND: Registrant has submitted a label updated in accordance with PR notice 81-3. Last accepted label is of May 27, 1969. Product is supposed to be used for manufacture of pesticides.

COMMENTS:

1. Since acute toxicity data was not submitted, the PM team must determine appropriateness of precautionary labeling, presumably on the basis of a similar registered product. The following points were noted by TSS:

- a. There is no signal word on proposed updated label. Registry of Toxic Effects of Chemical Substances lists acute oral LD₅₀ for rat 500 mg/kg, so signal word Warning is appropriate.
- b. There should be a statement of Practical Treatment for oral ingestion, toxicity category II.

Rita Kumar
IRB/TSS

Rita Kumar

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

*Working
copy*

**Para
Moth Balls
Cedar Scented**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT. 10 oz (283.5 g)

ACTIVE INGREDIENTS:

Paradichlorobenzene..... 99.94%

INERT INGREDIENTS..... 0.06%

CAUTION

KEEP OUT OF REACH OF CHILDREN
SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-R
EPA Est. No. 70305-NJ-01

70305-E

Left & Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

**Para
Moth
Balls**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS
AND DEODORIZES
CLOTHING AND
FABRICS**

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015

97 MAR 11 P1:37

RECD EPA/OPP/DPD1

Back Panel

PRECAUTIONARY STATEMENTS:

Hazard to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid contact with skin, eyes, or clothing

STATEMENT OF PRACTICAL TREATMENT:

IF SWALLOWED: Do NOT induce vomiting. Drink large quantities of water. Get immediate medical attention.

IF IN EYES OR ON SKIN: Flush immediately with plenty of water for at least 15 minutes and get medical attention.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product in a manner inconsistent with its labeling

Para Moth Balls can be used anywhere that clothes or fabric protection is desired - closets, drawers, chests, garment bags and storage trunks. Prepare articles for storage by thoroughly brushing and cleaning, then place where needed. Use 10 ounces of Para Moth Balls for each 25 cubic feet of confined storage space. Spread Para Moth Balls liberally throughout the storage space to provide uniform freshness and protection. Storage containers should be tightly closed at all times to maximize effectiveness.

Para Moth Balls contain paradichlorobenzene which should not be put into contact with other chemicals or placed on painted, polished, or plastic surfaces.

Notice: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

STORAGE AND DISPOSAL:

Store in original container in a cool, dry place until ready for use. Do not use where temperatures are in excess of 100 degrees.

Do not reuse cellophane or any portion of this package. Wrap completely and throw in trash.

PARAGON
HOUSEHOLD PRODUCTS INC.



United States
Environmental Protection Agency
Washington, DC 20460
EXPEDITED REVIEW

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

244437

Application for Pesticide - Section I

1. Company/Product Number 70305- <i>K</i>	2. EPA Product Manager R. Brennis <i>WILLIAM JOHNS</i>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CEDAR SCENTED PARA MOTH BALLS	PM# #32 14	
5. Name and Address of Applicant (Include ZIP Code) PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 1475-39 Product Name ENOZ PARA MOTH BALLS	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 5.0/10.0/15.0 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Raymond E. McCreary		Title President		Telephone No. (Include Area Code) 201-591-0777	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>Raymond E. McCreary</i>		3. Title President			
4. Typed Name Raymond E. McCreary		5. Date 3/6/97			

40

DATE: September 23, 1997

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]
DP BARCODE No.: D238443 REG./File Symbol No.: 70305-E
PRODUCT NAME: Cedar Scented Para Moth Balls
COMPANY: Paragon Household Products Inc.

FROM: Shyam B. Mathur, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505C)

SB Mathur
9-23-97

TO: Tina Levine, PM 04
Insecticide-Rodenticide Branch/RD(7505C)

INTRODUCTION

The product was reviewed previously(dated 4-23-97) and several deficiencies were pointed out to the registrant. To address the issue of the clearance of the fragrance used in the formulation, the registrant provided additional information on the fragrance in question.

SUMMARY OF FINDINGS

With the additional information available on the chemical composition of the fragrance from the registrant, the fragrance was cleared by the Agency.

The basic formulation CSF(dated 3-6-97)is filled out correctly and completely in compliance with PR Notice 91-2 and agree with the label claim nominal concentration.

CONCLUSION

The basic formulation CSF(dated 03-06-97) is acceptable.

The product Cedar Scented Para Moth Balls(Reg. No. 70305-E) is substantially similar to p-dichlorobenzene [REDACTED] in chemical composition. The only difference is that former contains a fragrance and the later does not.

In compliance with 40CFRSec.156.10(h)(2)(iii), the product label must have the following statement under Physical-Chemical Hazards:

"DO NOT USE OR STORE NEAR HEAT OR OPEN FLAME"

10/30/97
NOTE: The details
on the composition
of the inert
are on a sheet
attached to CSF
DB Mathur

DP BARCODE: D238443

CASE: 061635
SUBMISSION: S528736

DATA PACKAGE RECORD
BEAN SHEET

DATE: 08/25/97
Page 1 of 2

D238443
Recd 6701

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 161 RESB NEW PROD-"ME TOO"
CHEMICALS: 061501 Paradichlorobenzene

99.9400%

ID#: 070305-E CEDAR SCENTED PARA MOTH BALLS

COMPANY: 070305 PARAGON HOUSEHOLD PRODUCTS INC

PRODUCT MANAGER: 04 TINA LEVINE

703-308-7055 ROOM: CM2 219

PM TEAM REVIEWER: DANIEL PEACOCK

703-305-5407 ROOM: CM2 221

RECEIVED DATE: 07/31/97

DUE OUT DATE: 10/29/97

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 238443 EXPEDITE: N DATE SENT: 08/25/97 DATE RET.: / /

CHEMICAL: 061501 Paradichlorobenzene

P TYPE: 001

CSF: Y

LABEL: Y

ASSIGNED TO

DATE IN

DATE OUT

ADMIN DUE DATE: 10/09/97

DIV : RD

/ /

/ /

NEGOT DATE: / /

BRAN: TRB

/ /

/ /

PROJ DATE: / /

SECT: IO

/ /

/ /

REVR : S.B. Mathew

9/17/97

9/23/97

CONTR:

/ /

/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Shyam,

Please review the attached letter and attachment from the maker of the fragrance used in this PDB product. The attachment lists the components of the fragrance.

Considering that the only difference between this pending product (70305-E) and registered product [REDACTED] is the very small amount of fragrance [REDACTED] it would seem that the main consideration would be the:

- 1) chemical identity of the fragrance
- 2) if any component looked toxic

The registrant thought that this fragrance was in other registered products. I suggested that he provide the registration of any such products.

I indicated to the registrant that the review is estimated to take 1 month.

Attached are: 1. label
2. CSF
3. your review

Product ingredient source information may be entitled to confidential treatment

DP BARCODE: D238443

CASE: 061635
SUBMISSION: S528736

DATA PACKAGE RECORD (CONTINUED)
BEAN SHEET

DATE: 08/25/97
Page 2 of 2

* * * DATA REVIEW INSTRUCTIONS * * *

Thank you,

Dan Peacock, 305-5407

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
-------	----------------	----------	----------	-----	-----	-------

Case: 061635
Submission: S521444

SUBMISSION SUBSYSTEM
SUBMISSION DATA PACKAGE LIST

Date: 07/03/97
Time: 7:40 am

*Find completed
chem review*

CASE/SUBMISSION INFORMATION

CASE TYPE: REGISTRATION ACTION: 160 NEW PRODUCT - ROUTINE "ME TOO"
070305-E CEDAR SCENTED PARA MOTH BALLS
COMPANY NAME: 070305 PARAGON HOUSEHOLD PRODUCTS INC
PRIME CHEM: 061501 Paradichlorobenzene MIX? N
STATUS: Pending REGIST: / / RU: N CRP: N EU: N FORM: TYPE:
PM/RM:14 BILL JACOBS REVR: D PEACOCK PH:305-5407 RM:CM2 221
IN:03/13/97 DUE OUT:06/09/97 (07/23/97) PM OUT: / / DUE BACK: / /

DATA PACKAGE INFORMATION

DP BC	EXP	BRANCH	SENT	ADMN DUE	NEGO DUE	PROJ DUE	RETURNED	GDL	INS
D235067	N	RSB	04/10/97	05/25/97	/ /	/ /	04/22/97	N	Y

PE: 001 Submission Related Data Package
PC_CODE: 061501 Paradichlorobenzene

RANKING:
(F2)

F1 Help
F10 Error

Select a data package to view with light bar and press ENTER
or press ESC for the command line

|=|↑|↓|

160/38
5-521444
7/11/97

JACKETS (Fileroom Document Tracking System)
Jacket Locations

07/16/97
09:59:52
DPEACOCK

Requested Case File #	Actual Case File #	Vol/Total	Location	Status
-----------------------	--------------------	-----------	----------	--------

1759-7

001759-00007

1 / 1

Jacket is in the File room

A:05/75

7/17/97
Co called & asked if they want to re package. They would only have to make labels change JBearants 7/17/97

Co called & said that they already had a product without the fragrance. I told them for their supplier to send in the ID of fragrance

Called Mr. McCham to bring

He source they want to get on product

Source
1) Jacket requested 7/16
2) say if source has fragrance
3) this is so would be better if just repackaging

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]
DP BARCODE No.: D235067 REG./File Symbol No.: 70305-E
PRODUCT NAME: Cedar Scented PARA Moth Balls

DATE: April 22, 1997

TO: William Jacobs, PM 14
Insecticide-Rodenticide Branch
Registration Division(7505C)

FROM: Shyam B. Mathur, Ph.D., Chemist
Product Chemistry Review Section
Registration Support Branch/RD (7505W)

THRU: Harold Podall, Ph.D., Section Head
Product Chemistry Review Section
Registration Support Branch/RD(7505W)

S. B. Mathur
4-23-97

248
4/23/97

SUMMARY OF FINDINGS

1. The basic formulation CSF(dated 10-07-96) is not acceptable, since the fragrance used in the formulation is not cleared by the Agency. The data submitted corresponding to the guideline reference 61-1 and 62-2 does not satisfy the data requirements of 40CFR §158.155 and 158.175 respectively.

The registrant must submit additional information on [REDACTED] which must include the complete chemical composition of this inert with chemical names, CAS numbers, and percentages of each component of this inert ingredient.

2. The data submitted corresponding to the guideline reference 61-2 and 61-3 satisfy the data requirements of 40CFR158.165 and 158.167 respectively.

3. The registrant must submit or cite the data corresponding to the guideline reference 62-3 (Analytical methods to verify certified limits). This is considered as a data gap.

4. The data submitted corresponding to the guideline reference 63-3, 7, 14-21 satisfy the data requirements of 40CFR§158.190.

5. The registrant has indicated the pH of the product to be 6.9 to 7.1 (in the CSF dated 02-06-97). The registrant is requested to submit the details of the method for determining this property.

6. In compliance with 40CFR§156.10(h)(2)(iii), the product label must have the following statement under Physical-Chemical Hazards:

"Do Not Use Or Store Near Heat Or Open Flame".

7. The registrant must cite or submit the data for Corrosion characteristics(63-20).

PRODUCT CHEMISTRY REVIEW OF MP ☐ EP ☒
 DP BARCODE No.: D235067 REG./File Symbol No.: 70305-E
 PRODUCT NAME: Cedar Scented PARA Moth Balls
 DATE: 04-22-97

1. Reviewer: S.B.Mathur 2. Company: Paragon Household Products Inc.
3. Type of Submission: Registration ☒ Reregistration ☐
 New ☒ Resubmission ☐ Amendment ☐ "ME-TOO" ☒
 Alternate Formulation ☐ Experimental Use Permit ☐
 Other (Specify) _____
4. If "Me-TOO" Registration, this product is ☒ is not ☐
 similar or substantially similar to EPA's Reg. No.: 1475-39

If not, comment in Confidential Appendix A on the differences between the registered and the new source where significant.

CONFIDENTIAL STATEMENT OF FORMULA

5. Type of formulation and the sources of active ingredients:
- Non-integrated formulation system.....☒
 - Are all technical grade active ingredients used registered?
 - yes ☒ • no ☐, If no, specify _____
 - Integrated formulation system.....☐
6. Clearance of intentionally added ingredients in the formulation for the intended use (indicate in the Confidential Appendix those that are not cleared; the PC Codes should be provided by the chemist on the CSF for those that are cleared):
- 6(a) Formulation intended for food use under 40CFR§180.1001:
- yes ☐ • no ☒ • Some are cleared, others are not ☐
 - Cleared under list: • c ☐ • d ☐ • e ☐
 - Are there any limitations for use as an inert under 40CFR§180.1001?
 - yes ☐ • no ☐, If yes, specify _____
- 6(b) Formulation intended for non-food use:
- yes ☒ • no ☐ • Some are cleared, others are not ☐
- 6(c) Clearance by the FDA of certain formulations under 21CFR§170 to 199. Examples: (a) indirect food additives, such as food contact surface sanitizers; adhesives, coatings, paper and paperboard products that may contact food in packaging or holding; and (b) substances generally recognized as safe (GRAS).
- yes ☐ • no ☐ • Some are cleared, others are not ☐
 - If yes, the entire formulation is cleared under 21CFR§_____.

7. The density, pH, and flammability values given on the CSF are identical with those of GRN 63-7, 63-12, and 63-15, respectively: • yes [X] • no []
8. The nominal concentrations (NC) of the active ingredients and the upper and lower certified limits (UCL & LCL) are as follows:

Active ingredient(s)	% by weight		
	NC	UCL	LCL

1,4-Dichlorobenzene

Product ingredient source information may be entitled to confidential treatment

9. The calculated NCs, based on the pure active ingredients (PAI), are identical to those on the label: • yes [X] • no []
10. The certified limits are within the standard limits as per 40CFR§158.175 or are adequately explained if different: • yes [X] • no []

PRODUCT LABEL

11. The chemical names of the active ingredients on the label are identical to those on the CSF: • yes [X] • no []
12. The appropriate physical and chemical hazards statement regarding flammability or explosive characteristics of the product are given on the label: • yes [] • no [X] • not applicable []
- Since Flash Pt. is 148°F, the product label should have statement "Do Not Use Or Store Near Heat Or Flame" under Physical-Chemical Hazards.
13. The storage and disposal instructions for the pesticide and container are in compliance with PR Notice 84-1 for household use products or PR Notice 83-3 for all other uses: • yes [X] • no []

PRODUCT CHEMISTRY DATA (SERIES 61, 62, 63)

14. <u>Chemical IDs/Manufacture/ Analytical Information</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
61-1 Chemical Identity(CSF)	U	02-06-97
61-2 Start.Mat.& Mfg.Process	Y	442328-01
61-3 Discussion of Impurities	Y	442328-01
62-1 Preliminary Analysis	NA	
62-2 Certified Limits(CSF)	U	02-06-97
62-3 Enforcement Analytical Method	G	

15. <u>Physical/Chemical</u>	<u>Pro per tie s</u>	<u>Data Required Fulfille d</u>	<u>Value or Qualitat. Descrip.</u>	<u>MRID No.</u>
63-3 Physical State		Y	Solid	442348-02
63-7 Density/Bulk Density		Y	6.86 lbs per gal	" "
63-12 pH of Product		U	6.9-7.1	CSF
63-14 Oxid/Red Action		NA		
63-15a Flammab.-Flsh.Pt.		Y	148°F	CSF
63-15b Flame Extension		NA		
63-16 Explodability		NA		
63-17 Storage Stability		PR 92-5		
63-18 Viscosity		NA		
63-19 Miscibility		NA		
63-20 Corros.Charact.		G		
63-21 Dielec.Bkd.vltg.		NA		

Explanations: Y = The Requirements Were Fulfilled; N = The Requirements Were Not Fulfilled; NA = Not Applicable;
G = Data Gap; U = Requires Upgrading; I = Incomplete or In Progress; W = Waived.

Mathur

DP BARCODE: D235067

CASE: 061635
SUBMISSION: S521444

DATA PACKAGE RECORD
BEAN SHEET

DATE: 04/10/97
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 160 NEW PROD-"ME TOO"
RANKING : 0 POINTS ()
CHEMICALS: 061501 Paradichlorobenzene

99.9400%

ID#: 070305-E CEDAR SCENTED PARA MOTH BALLS
COMPANY: 070305 PARAGON HOUSEHOLD PRODUCTS INC
PRODUCT MANAGER: 14 WILLIAM JACOBS 703-305-6406 ROOM: CM2 259
PM TEAM REVIEWER: DANIEL PEACOCK 703-305-5407 ROOM: CM2 221
RECEIVED DATE: 03/11/97 DUE OUT DATE: 06/09/97

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 235067 EXPEDITE: N DATE SENT: 04/10/97 DATE RET.: / /
CHEMICAL: 061501 Paradichlorobenzene
DP TYPE: 001 Submission Related Data Package
CSF: Y LABEL: Y

ASSIGNED TO	DATE	IN	DATE	OUT	ADMIN DUE DATE: 05/25/97
DIV : RD	/	/	/	/	NEGOT DATE: / /
BRAN: RSB	/	/	/	/	PROJ DATE: / /
SECT: PCRS	/	/	/	/	
REVR : S.B. Mathur	4/21/97		4/23/97		
CONTR:	/	/	/	/	

* * * DATA REVIEW INSTRUCTIONS * * *

Chemist,

Please review that attached data (442349-01 and -02)
for this product.

Thanks,

Dan Peacock, 305-5407

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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DP BARCODE: D235067

CASE: 061635
SUBMISSION: S521444

DATA PACKAGE RECORD
BEAN SHEET

DATE: 04/10/97
Page 1 of 1

* * * CASE/SUBMISSION INFORMATION * * *

CASE TYPE: REGISTRATION ACTION: 160 NEW PROD-"ME TOO"

RANKING : 0 POINTS ()

CHEMICALS: 061501 Paradichlorobenzene

99.9400%

ID#: 070305-E CEDAR SCENTED PARA MOTH BALLS

COMPANY: 070305 PARAGON HOUSEHOLD PRODUCTS INC

PRODUCT MANAGER: 14 WILLIAM JACOBS

703-305-6406

ROOM: CM2

259

PM TEAM REVIEWER: DANIEL PEACOCK

703-305-5407

ROOM: CM2

221

RECEIVED DATE: 03/11/97

DUE OUT DATE: 06/09/97

* * * DATA PACKAGE INFORMATION * * *

DP BARCODE: 235067

EXPEDITE: N

DATE SENT: 04/10/97

DATE RET.: / /

CHEMICAL: 061501 Paradichlorobenzene

DP TYPE: 001 Submission Related Data Package

CSF: Y

LABEL: Y

ASSIGNED TO

DATE IN

DATE OUT

ADMIN DUE DATE: 05/25/97

DIV : RD

/ /

/ /

NEGOT DATE: / /

BRAN: RSB

/ /

/ /

PROJ DATE: / /

SECT: PCRS

/ /

/ /

REVR :

/ /

/ /

CONTR:

/ /

/ /

* * * DATA REVIEW INSTRUCTIONS * * *

Chemist,

Please review that attached data (442349-01 and -02)
for this product.

Thanks,

Dan Peacock, 305-5407

* * * DATA PACKAGE EVALUATION * * *

No evaluation is written for this data package

* * * ADDITIONAL DATA PACKAGES FOR THIS SUBMISSION * * *

DP BC	BRANCH/SECTION	DATE OUT	DUE BACK	INS	CSF	LABEL
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- DATA REQUIREMENT LISTING FOR THE SELECTIVE METHOD OF SUPPORT

1. PRODUCT NAME: CEDAR SCENTED PARA MOTH BALLS	2. EPA REG.NO./FILE SYMBOL: 70305-R <i>70305-E</i>	3. FORMULATOR'S EXEMPTION SELECTED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	4. PAGE <u>1</u> OF <u>2</u>
5. APPLICANT'S (COMPANY) NAME AND ADDRESS: PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015	6. APPLICATION FOR REGISTRATION DATED: <u>2/6/97</u> MONTH DAY YEAR	7. NAME OF ACTIVE INGREDIENT(S): para-Dichlorobenzene	

8. 40 CFR Part 158 - DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENT						
8a. Guide- line Refer- ence Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (give name)	9d. Certificate of Permis- sion (P) or Offer to Pay (OTP) enclosed: indicate "P" or "OTP"	9e. Public Litera- ture	9f. N.A. or Waiver or other (explain)	10. MRID Number, EPA Accession Number, or other identifying number
Section 158.190	<u>PRODUCT CHEMISTRY</u>							
61-1	Identity of ingredients	X	2/6/97					
61-2	Statement of composition	X	2/6/97					
61-3	Discussion of formation of ingredients	X	2/6/97					
62-1	Preliminary analysis							
62-2	Certification of limits	X	2/6/97					
62-3	Analytical method for enforcement limits							
63-3	Physical State	X	2/6/97					
63-5	Melting Point	X	2/6/97					
63-6	Boiling Point							

DATA MATRIX

DATA REQUIREMENT LISTING FOR THE SELECTIVE METHOD OF SUPPORT

1. PRODUCT NAME: CEDAR SCENTED PARA MOTH BALLS	2. EPA REG.NO./FILE SYMBOL: 70305-R <i>70305-E</i>	3. FORMULATOR'S EXEMPTION SELECTED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	4. PAGE 2 OF 2
5. APPLICANT'S (COMPANY) NAME AND ADDRESS: PARAGON HOUSEHOLD PRODUCTS INC. P.O.Box 2169 233 Clifton Blvd. Clifton, NJ 07015	6. APPLICATION FOR REGISTRATION DATED: 2/6/97 MONTH DAY YEAR	7. NAME OF ACTIVE INGREDIENT(S): para-Dichlorobenzene	

8. 40 CFR Part 158 - DATA REQUIREMENTS		9. SOURCE OF DATA SATISFYING REQUIREMENT						
8a. Guide- line Refer- ence Number	8b. Name of Test	9a. Submitted by Applicant	9b. Date Submitted	9c. Submitted by another person/firm (give name)	9d. Certificate of Permis- sion (P) or Offer to Pay (OTP) enclosed: indicate "P" or "OTP"	9e. Public Litera- ture	9f. N.A. or Waiver or other (explain)	10. MRID Number, EPA Accession Number, or other identifying number
Section 158.190	<u>PRODUCT CHEMISTRY</u> (continued)							
63-7	Density, bulk- density, or specific gravity	X	2/6/97					
63-8	Solubility							
63-9	Vapor Pressure							
63-10	Dissociation constant							
63-11	Octanol/water partition coefficient							
63-12	pH							
63-13	Stability							
63-14	Oxidizing/ reducing reaction							
63-15	Flammability							
63-16	Explodability							

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs

PARAGON HOUSEHOLD PRODUCTS INC
C/O RAYMOND E. MCCREARY
P.O. BOX 2169, 233 CLIFTON BLV
CLIFTON, NJ 07015

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your transmittal of 03/11/97. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

442348-00

REC'D
MAR 11 91 35

CERTIFIED MAIL

U.S. EPA
Front End Processing Staff
Information Services Branch
Program Management and Support Division
401 M. Street, S.W.
Washington, D.C. 20460

RE: Application for a New Me-Too Registration
EPA File Symbol 70305-R, OPP ID #244437

70305-E

February 7, 1997

Dear Sir/Madam:

This is regarding the application for "Me-Too" registration of our product "CEDAR SCENTED PARA MOTH BALLS".

Please find enclosed the following:

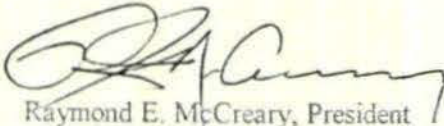
- Application for Pesticide Registration, Form 8570-1;
- Confidential Statement of Formula, Form 8570-4;
- Formulator's Exemption, Form 8570-27;
- Chemistry Study, 3 copies;
- Certification with Respect to Citation of Data, EPA Form 8570-29;
- Data Matrix; and
- 5 copies of proposed labeling.

We advise you that our supplier for the cedar fragrance used as Inert Ingredient in formulation of our product is [REDACTED]

This company agreed to provide EPA directly with any additional information regarding the chemistry of their fragrance, if requested.

We trust that our application will pass the administrative screen for completeness and it will be forwarded to Registration Division Team 32 for an Expedited Review.

Sincerely,


Raymond E. McCreary, President

Enclosures

Product ingredient source information may be entitled to confidential treatment

Transmittal Document

Name & Address
of Submitter:

PARAGON HOUSEHOLD PRODUCTS INC.
P.O. Box 2169
Clifton, New Jersey 07015

EPA Registration: 70305-2

Regulatory Action: Submittal of End-Use
Product Chemistry Study


Transmittal Date: March 6, 1997

MRID#

44234801 Volume 1 Product Identity and Composition of CEDAR SCENTED
PARA MOTH BALLS

44234802 Volume 2 Physical and Chemical Characteristics of CEDAR SCENTED
PARA MOTH BALLS

Company Official: Raymond E. McCreary


Signature

Company Name: PARAGON HOUSEHOLD PRODUCTS, INC.

Company Contact: Raymond E. McCreary, (201) 591-0777

97 MAR 11 P1:35

REC'D 11/01/97

PARAGON

Household Products, Inc.

P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (201) 591-0777
Fax: (201) 591-0770

442348-00

RECEIVED
97 MAR 11 11:35

CERTIFIED MAIL

U.S. EPA
Front End Processing Staff
Information Services Branch
Program Management and Support Division
401 M. Street, S.W.
Washington, D.C. 20460

RE: Application for a New Me-Too Registration
EPA File Symbol 70305-R, OPP ID #244437

70305-E

February 7, 1997

Dear Sir/Madam:

This is regarding the application for "Me-Too" registration of our product "CEDAR SCENTED PARA MOTH BALLS".

Please find enclosed the following:

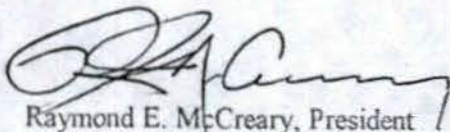
- Application for Pesticide Registration, Form 8570-1;
- Confidential Statement of Formula, Form 8570-4;
- Formulator's Exemption, Form 8570-27;
- Chemistry Study, 3 copies;
- Certification with Respect to Citation of Data, EPA Form 8570-29;
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Raymond E. McCreary, President

Enclosures

Product ingredient source information may be entitled to confidential treatment

Transmittal Document

Name & Address
of Submitter:

PARAGON HOUSEHOLD PRODUCTS INC.
P.O. Box 2169
Clifton, New Jersey 07015

EPA Registration: 70305-2

Regulatory Action: Submittal of End-Use
Product Chemistry Study

Transmittal Date: March 6, 1997

MRID#

44234801 Volume 1 Product Identity and Composition of CEDAR SCENTED
PARA MOTH BALLS

44234802 Volume 2 Physical and Chemical Characteristics of CEDAR SCENTED
PARA MOTH BALLS

Company Official: Raymond E. McCreary


Signature

Company Name: PARAGON HOUSEHOLD PRODUCTS, INC.

Company Contact: Raymond E. McCreary, (201) 591-0777

97 MAR 11 P1:35

REC'D E.A. P/DPD1

NEW REGISTRATION OR NEW EUP

APP# 244437

FAST TRACK *
APPLICATION FOR NEW REGISTRATION

WITH DATA

NO DATA

	Init.	Date		Init.	Date
FEU	<u>FEU</u>	<u>3-12-97</u>	FEU	_____	_____
Fileroom/JACKETS	<u>GA</u>	<u>3-13-97</u>	Fileroom/JACKETS	_____	_____
SIG (DATA)	<u>PM</u>	<u>3/13/97</u>	PM	_____	_____
Fileroom/JACKETS	<u>BY</u>	<u>3/13/97</u>			
PM <u>14</u>	_____	_____			

REGULAR APPLICATION FOR NEW APPLICATION
OR
EXPERIMENTAL USE PERMIT

Includes new petition for Tolerance: YES or NO

WITH DATA

NO DATA

	Init.	Date		Init.	Date
FEU	_____	_____	FEU	_____	_____
Fileroom/JACKETS	_____	_____	Fileroom/JACKETS	_____	_____
SIG (DATA)	_____	_____	PM	_____	_____
Fileroom/JACKETS	_____	_____			
PM	_____	_____			

* Front End Processing determined this application qualifies for fast track review based of registrants claim of "me-too". No screen for substantial similarity is made by the Front End Processing Section.

3-12-97
Lpp# 244437

FRONT END PROCESSING APPLICATION INFORMATION CHECK

PM ✓ 14

EPA COMPANY NUMBER ✓ 70305-F

EPA REGISTRATION NUMBER
STATUS (For Amendments)

Active _____ Cancelled _____

Not in REFS _____

"ME-TOO" CITED PRODUCT STATUS

Active ✓ Cancelled _____

Not in REFS _____

PRAT RECORD CREATED ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

03/12/97

RAYMOND E MCCREARY
PARAGON HOUSEHOLD PRODUCTS INC
P.O. BOX 2169
233 CLIFTON BLVD
CLIFTON NJ 07015

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PRODUCT NAME: CEDAR SCENTED PARA MOTH BALLS
COMPANY NAME: PARAGON HOUSEHOLD PRODUCTS INC
OPP IDENTIFICATION NUMBER: 244437
EPA FILE SYMBOL: 70305-E
EPA RECEIPT DATE: 03/11/97

SUBJECT: RECEIPT OF APPLICATION FOR A NEW ME-TOO REGISTRATION

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for a new 'me-too' registration and it has passed an administrative screen for completeness.

During the initial screen we determined that the application qualifies for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability.

If you have any questions, please contact Karen Whitby, Product Manager 14, at (703)-305-5404.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. White".

Front End Processing Staff
Information Services Branch
Program Management and Support Division



Certification with Respect to Citation of Data

Applicants Name and Address

PARAGON HOUSEHOLD PRODUCTS, INC.
P.O. Box 2169 233 Clifton Blvd.
Clifton, NJ 07015

EPA File Symbol/Registration Number

70305-R

70305-E

Product Name CEDAR SCENTED PARA MOTH BALLS

Date of Application

2/6/97

NOTE: If your product is a 100% repackaging of another EPA-registered product that you purchase, and is labeled for the same uses, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

1. This application is supported by all data submitted or cited in the application. In addition, if cite-all options are indicated, this application is supported by all data in the Agency's files that concern the properties or effects of this product that is identical or substantially similar and that is one of the types of data that would be required to be submitted if this application sought the initial registration of a product of identical or similar composition and intended uses under the data requirements in effect on the date of approval of this application. (Check the appropriate boxes, in items 2 and 3, or 4 below that pertain to your application.)

2. I certify that, for each study cited in support of this application for registration that is an exclusive use study.

☒ I am the original submitter*; or

☐ I have obtained the written permission of the original submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*

3. I certify that, for each study cited in support of this application for registration that is not an exclusive use study;

a. ☐ I am the original data submitter*; or

☐ I have obtained the written permission of the original data submitter for _____, which is
(insert name of chemical)
_____ (for multiple chemicals link the companies who are original data submitters
(insert names of companies)
with the appropriate chemical name) to cite that study*; or

b. ☐ I have notified in writing the companies _____ for _____ that
(insert names of companies) (insert name of chemical)

have submitted data I have cited to support this application and have offered to: (a) Pay compensation for those data in accordance with section 3(c)(1)(F) and 3(c)(2)(D) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA); and (b) Commence negotiations to determine which data are subject to the compensation requirement of FIFRA and the amount and terms of compensation due, if any. The companies I have notified are:

Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
listed on the Pesticide Data Submitters List for all active ingredients contained in my product (cite-all method or cite-all option under Selective Method*). (Also, sign the General Offer Statement below.)
Companies _____ for _____ (for multiple
(insert names of companies) (insert name of chemical)
chemicals link the companies who are original data submitters with the appropriate chemical name)
that have submitted the studies which I have cited (Selective method*).

4. ☐ I certify that for each study cited in support of this application I am not required to offer data compensation or obtain written permission because all time periods for exclusive use and data compensation have expired.

* A Data Matrix identifying these studies is attached. (Note: a Data Matrix is not required under the cite-all method)

Signature

Name and Title

Raymond E. McCreary, Pres.

Date

2/6/97

General Offer to Pay: I hereby offer and agree to pay compensation to other persons, with regard to the approval of this application, to the extent required.

Signature

Name and Title

Date

Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 2.5 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining needed data, and completing and reviewing this application form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: Chief, Information Policy Branch, 2136, U.S. Environmental Protection Agency, 401 M Street, S. W., Washington, DC 20460; and to Office of Management and Budget, Paperwork Reduction Project (2070-0055), Washington, DC 20503, marked "Attention Desk Officer for EPA."



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015	EPA File Symbol/Registration Number <p style="text-align: center;">70305-E</p>
	Product Name <p style="text-align: center;">CEDAR SCENTED PARA MOTH BALLS</p>
	Date of Confidential Statement of Formula (EPA Form 8570-4) <p style="text-align: center;">2/6/97</p>

As an authorized representative of the applicant for registration of the product identified above, I certify that:

- (1) This product contains the following active ingredient(s):

99.94% para-Dichlorobenzene

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

- (3) Indicate by checking (A) or (B) below which paragraph applies:

- ☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).
- OR
- ☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
1,4 Dichlorobenzene	[REDACTED]	[REDACTED]
<p>*Product ingredient source information may be entitled to confidential treatment*</p>		
Signature 	Name and Title Raymond E. McCreary, Pres.	Date <p style="text-align: center;">2/6/97</p>

Paperwork Reduction Act Notice

The public reporting burden for this collection of information is estimated to average 1.5 hours per response, including familiarization with the form, organizing the necessary information, and completing the form. Send any comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

Chief, Information Policy Branch, PM-223
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

and to

Office of Management and Budget
Paperwork Reduction Project (2070-0060)
Washington, DC 20503



United States
Environmental Protection Agency
Washington, DC 20460
EXPEDITED REVIEW

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number
244437

Application for Pesticide - Section I

1. Company/Product Number 70305- K	2. EPA Product Manager WILLIAM JOHNSON R. Brennis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CEDAR SCENTED PARA MOTH BALLS	PM# #32 14	
5. Name and Address of Applicant (Include ZIP Code) PARAGON HOUSEHOLD PRODUCTS, INC. P.O. Box 2169 233 Clifton Blvd. Clifton, NJ 07015		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 1475-39 Product Name ENOZ PARA MOTH BALLS
<input type="checkbox"/> Check if this is a new address		

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 5.0/10.0/15.0 oz		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Raymond E. McCreary	Title President	Telephone No. (Include Area Code) 201-591-0777
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title President	
4. Typed Name Raymond E. McCreary	5. Date 3/6/97	

PAPERWORK REDUCTION ACT NOTICE and INSTRUCTIONS

PAPERWORK REDUCTION ACT NOTICE: Public reporting burden for this collection of information is estimated to average 0.85 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Chief, Information Policy Branch, (2136), U.S. Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460.

INSTRUCTIONS: This form is to be used for all applications for new registration, and use reregistration, amendment, resubmission, to applications for notifications, final printed labeling, reregistration, etc. In order to process an application for a new registration submitted on this form, the following material must accompany the application:

1. Certification with Respect to Citation of Data (EPA Form 8570-29). (If not exempted by 40 CFR 152.81 (b) (4));
2. Confidential Statement of Formula (EPA Form 8570-4);
3. Formulator's Exemption Statement (EPA Form 8570-27);
4. Five copies of draft labeling;
5. Three copies of any data submitted;
6. Authorization letter where applicable;
7. Matrices where applicable.

Submission of Labeling - Labeling should first be submitted in the form of draft labels with all applications for new registration. Such draft labels may be in the form of typed label text on 8.5 x 11 inch paper for submission or a mockup of the proposed label. If prepared for mockup, it should be constructed in a way as to facilitate storage in an 8.5 x 11 inch file. Mockup labels significantly smaller than 8.5 x 11 inches should be mounted on 8.5 x 11 inch paper for submission.

Submission of Data - Data submitted in support of this application must be submitted in accordance with PR Notice 86-5.

SPECIFIC INSTRUCTIONS: Please read the instructions listed below before completing this application. First determine the type of registration action, listed in Block A, for which you are submitting this application. For applications submitted in connection with New Registration actions, Sections I, III, and IV must be completed by the applicant. For applications submitted in connection with amended reregistration actions, resubmissions, notifications, reregistrations, etc., Sections I, II, and IV must be completed by the applicant.

Block A - Check the appropriate action for which you are submitting this form.

SECTION I - This section must be completed, as applicable, for all registration actions.

1. **Company/Product Number** - Insert your Company Number, if one has been assigned by EPA. This number may have been assigned to you as a basic registrant, a distributor, or as an establishment. If your product is registered, insert the Product Number.
2. **EPA Product Manager** - If known, fill in the name and PM number of the EPA Product Manager.
3. **Proposed Classification** - Specify the proposed classification of this product.
4. **Product Name** - Enter the complete product name of this pesticide as it will appear on the label. The name must be specific to this product only. Duplication of names is not permitted among products of the same company. Do not include any brand name or company line designations.
5. **Name and Address of Applicant** - The name of the firm or person and address shown in your application is the person or firm to whom the registration will be issued. If you are acting in behalf of another party, you must submit authorization from that party to act for them in registration matters. An applicant not residing in the United States must have an authorized agent residing in the United States to act for them in all registration matters. The name and complete mailing address of such an agent must accompany this application.
6. **Expedited Review** - FIFRA section 3 (c) 3 (B) provides for expedited review of applications for registration, or amendments to existing registrations, that are similar or identical to other pesticide products that are currently registered with the EPA. In order for your application to be eligible for expedited review, you must provide us with the EPA Registration Number and product name of the product you believe is similar to or identical to your product. The product must be similar or identical in both formulation and labeled uses.

SECTION II - This section must be completed for all applications submitted to amend the registration only of a currently registered product (Amendment), for a resubmission in response to an Agency letter, for notifications to the Agency, for the submission of final printed labeling, for reregistration and for any other action that pertains to a specific EPA-registered product. This section is not to be used for a new application for registration.

1. **Subject of submission** - Check the applicable block and provide the Agency letter date if appropriate. Provide a brief explanation of the purpose(s) for the submission, such as "the addition of a site, pest or crop (specify)"; "amend the Confidential Statement of Formula by..."; "reregistration submission"; "general label revision of use directions." Attach a separate page if additional space is needed.

SECTION III (Packaging and Container Information) - This Section must be completed for all applications submitted in connection with new registration or applicable amendments.

1. **Type of Packaging** - Check the appropriate block if your product will be packaged in the indicated packaging types. Indicate the size of the individual packets and number per retail container.
2. **Type of Retail Container** - Indicate type of container in which product will be marketed.
3. **Location of Net Contents** - Indicate the location of the net contents information for your product.
4. **Size(s) of Retail Container** - Specify the net contents of all retail containers for your product.
5. **Location of Use Directions** - Indicate the location of the use directions for your product.
6. **Manner in which label is affixed to product** - Indicate the method product label is attached to retail container.

SECTION IV (Contact Point) - This Section must be completed for all applications for Registration actions, i.e., new products registration, resubmission, "me-too," reregistration, etc.

- 1-5. Self-explanatory.
6. EPA Use Only.



U.S. ENVIRONMENTAL
PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7504P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg.

70305-2

Date of
Issuance:
NOV 06 2013

NOTICE OF PESTICIDE:

☒ Registration
☒ Reregistration
(under FIFRA, as amended)

Terms of Issuance:
Unconditional

Name of Pesticide Product:

Paragon Moth Bars

HBC Chemical LLC

c/o

Matthew Brooks

Ag-Chem Consulting

12208 Quinque Lane

Clifton, VA 20124

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

EPA grants this reregistration under the authority of section 3(c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). With this accepted labeling, all requirements set forth in the Reregistration Eligibility Decision for Paradichlorobenzene have been satisfied. Therefore, EPA reregisters the product listed above. This action is taken under the authority of section 4(g)(2)(c) of FIFRA, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.

Confidential Statement of Formula

The acceptable Confidential Statements of Formula (CSFs) on record for this product are:

1 Basic CSF - dated 10/31/13

Alternate CSF #1 - dated 10/31/13

Alternate CSF #2 - dated 10/31/13

Alternate CSF #3 - dated 09/26/13

Alternate CSF #4 - dated 10/31/13

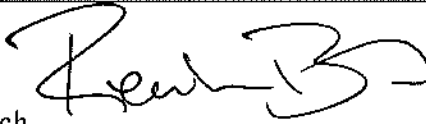
Any previously dated CSFs are superseded.

(next page)

Existing Stocks Provisions

Stocks of product with existing labels may be used for 12 months. A copy of your label stamped "Accepted" is enclosed for your records. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. If you have any questions regarding this label, please contact Gene Benbow at (703) 347-0235 or via email at benbow.gene@epa.gov.

Reuben Baris
Acting Product Manager 07
Insecticide-Rodenticide Branch
Registration Division



11/06/2013

Front Panel

Paragon Moth Bars

**[ABN: Moth Guard Moth Bars]
[ABN: Moth Guard Moth Cakes]
[ABN: Common Scents]**

**[Optional Language: Moth Preventative, Original
Scented, Cedar Scented, Lavender Scented, Lemon
Scented, Floral Scented]**

KILLS MOTHS AND CARPET BEETLES

NET WT.8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75%

OTHER INGREDIENTS:..... 0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

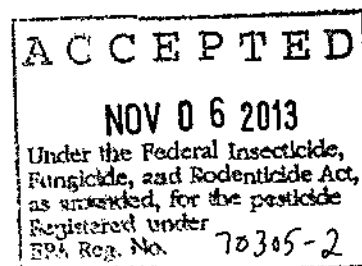
EPA Reg. No. 70305-2
EPA Est. No. 51311-IND-002 51311-PA-001

Left and Right Side Panels

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**Manufactured for HBC CHEMICALS LLC
324A Half Acre Road
CRANBURY, NJ 08512**



Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Use protective eyewear such as goggles or face shield. Harmful if absorbed through skin. Avoid contact with skin. Harmful if inhaled. Avoid breathing dust or vapor. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

PHYSICAL OR CHEMICAL HAZARDS

Combustible. Do not use or store near heat or open flame.

FIRST AID
IF IN EYES: Hold eye open and rinse slowly gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Pesticide Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Pesticide Disposal: Nonrefillable Container. Do not reuse or refill container. **If Empty:** Place in trash or offer for recycling if available. **If Partly Filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Statement with ABN: This product contain 2- 3oz cakes]

This product contains 1 -8 oz bar.

Net Wt. 6 oz [or 8 oz]

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.. Do not allow children to ingest this product.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 27, 2013

MEMORANDUM:

Subject: Paragon Moth Bars and Cakes
PC Code: 061501
EPA Reg. No.: 70305-2
Document Type: Acute Toxicity Review
MRID Nos.: 405210-01, 414109-01, 422053-01,-02,-03

DP Barcode: 414345
Case No.: 0649
CAS No.: 106-46-7
40 CFR: 158.500

From: Boris Yurchak, Chemist *BY*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Thru: Marquee D. King, Toxicologist
Acting Team Leader *MD King*
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

To: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

Applicant: Paragon Household Products
233 Clifton Blvd
Clifton, NJ 07015

FORMULATION FROM EPA Reg. No. 70305-2 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Para-Dichlorobenzene (1,4-dichlorobenzene).....	99.75%
<u>Other Ingredient(s):</u>	0.25%
Total	100.00%

TXL = 7002641

BACKGROUND: In their 8-month response to the Para-Dichlorobenzene RED (061501), the registrant is citing 6 acute toxicity studies to support the reregistration of the subject product, EPA Reg. No. 70305-2. The MRID's are as follows: 405210-01 (81-1), 405210-01 (81-2), 414109-01 (81-3), 422053-01 (81-4), 422053-02 (81-5), and 422053-03 (81-6). The acute oral (81-1) and acute dermal (81-2) studies were conducted by US EPA Health Effects research laboratory, RTP, NC, with a test material identified as "Para-Dichlorobenzene Technical Grade". The acute inhalation study (81-3) was conducted by Bio/dynamics Inc., with a test material identified as "para-dichlorobenzene". The primary eye irritation (81-4), primary dermal irritation (81-5), and dermal sensitization (81-6) studies were conducted by Hill Top Biolabs Inc., which utilized a test material identified as 'para-dichlorobenzene'. After reviewing the CSF and the studies, the Agency will allow the subject product to cite these studies.

RECOMMENDATIONS:

- Most of the acute toxicity studies cited (81-1, 81-2, 81-4, 81-5, and 81-6) were reviewed by RMIB V (B.C. Gregg, 02/17/2012, D398663) and found to be acceptable to support the reregistration of EPA Reg. No. 87108-2 that is substantial similar to the subject product 70305-2.
- An Acute Inhalation Toxicity study (81-3) was waived and assigned to category III by RMIB V review on 01/09/2013 (B. Yurchak, D403769).

The acute toxicity profile for EPA Reg. No. 70305-2 is currently:

Acute Oral	III	Cited (LD ₅₀ : Females: 3,790 mg/kg; Males: 3,863 mg/kg)
Acute Dermal	IV	Cited (LD ₅₀ : Females & Males > 6,000 mg/kg)
Acute Inhalation	III	Cited
Primary Eye	II	Cited
Primary Dermal	III	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING (Residential use):

ID #: 070305-00002 Paragon Moth Bars and Cakes

SIGNAL WORD: **WARNING**

Note: Due to category II of Primary eye and residential use, this product meets the criteria for restricted-use classification.

Causes substantial but temporary eye injury. Harmful if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Use protective eyewear. Avoid contact with skin. Avoid breathing dust or vapor*. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

* Because of the high vapor pressure, the product transits directly from solid to gas at ambient temperatures

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Date: September 27, 2013

Reg. No.: 70305-2

Product Name: Paragon Moth Bars

PM Name/Number: Reuben Baris, Risk Management Team 7

Primary Reviewer: Shirley Keel

Secondary Reviewer: Linda Arrington

New label or date of RD amended label: Received on 11/1/10

Formulation Type: Crystalline

Active Ingredient Assessed: Para-dichlorobenzene/061501

Other ai's in product

Name/PC code: N/A

Reregistration Status or Registration Date: N/A

Note to PM:

- 1) RD should ensure that the Storage and Disposal Section is in compliance with PR Notice 2007-4.
- 2) Child resistant packaging is triggered for this residential use product (Toxicity Category II classification for Primary Eye irritation).

Assessment can be found in N:\RMIBV\label\070305\002

-
- 1) The word "slowly" must be added to the following "If in Eyes" First Aid statements:

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

- 2) Based on toxicity ranking per the acute toxicity review, the First Aid statements should be placed on the label in the following order:

"IF IN EYES:...

IF SWALLOWED:...

IF INHALED:...

IF ON SKIN OR CLOTHING:..."

3) It is recommended that the First Aid statements be presented in a textbox (grid format) for prominence.

4) Per the acute toxicity review, the Hazards to Humans and Domestic Animals must be revised to read:

“WARNING: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Use **protective eyewear such as goggles or face shield**. Harmful if absorbed through skin. Avoid contact with skin. Harmful if inhaled. Avoid **breathing dust or vapor**. Harmful if swallowed. Wash thoroughly with soap and water after handling and **before eating, drinking, chewing gum, or using tobacco or using the toilet**. Remove and wash contaminated clothing before reuse.”

5) Data are present (Flash point: 149.9°F, in PC review dated 8/27/2013, under Barcode No. 414347, Page 3) to trigger the need for a Physical or Chemical Hazards statement on the product label. The heading “Physical or Chemical Hazards” must be added to the product label immediately below the Environmental Hazards Statement, followed by the required language “**Combustible. Do not use or store near heat or open flame.**”

6) The Storage and Disposal section needs minor revisions. Recommended revisions are listed below:

- Per Label Review Manual of January 2012, the subheading “Disposal” should be changed to “**Pesticide Disposal and Container Handling.**”
- The Storage and Disposal statements should be placed in a textbox for prominence.

7) Per the Para-dichlorobenzene RED, the following availability statement must appear in the Direction for Use section:

“Do not place in areas accessible to children.”

DATA PACKAGE BEAN SHEET

Date: 27-Sep-2013

Page 1 of 1

Decision #: 425799

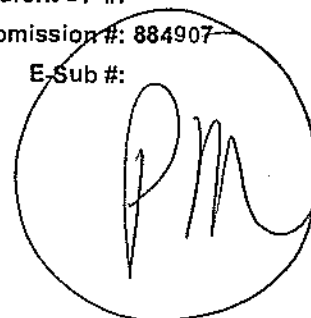
DP #: (415422)

NON PRIA

Parent DP #:

Submission #: 884907

E-Sub #:



*** Registration Information ***

Registration: 70305-2 - PARAGON MOTH BARS

Company: 70305 - HBC CHEMICAL, LLC

Risk Manager: RM 07 - Reuben Baris - (703) 305-7356 Room# PY1 S-7227

Risk Manager Reviewer: Veronica Dutch VDUTCH

Sent Date: 02-Nov-2010

PRIA Due Date: 01-Nov-2010

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (676) Product Reregistration Decision;

Ingredient(s): 061501, Paradichlorobenzene(99.75%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 27-Sep-2013

Due Back:

DP Ingredient: 061501, Paradichlorobenzene

DP Title: Final Registration para-Dichlorob Reg# 70305-2

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

Assigned To

Date In

Date Out

Organization: RD / IRB

Last Possible Science Due Date:

Team Name:

Science Due Date:

Reviewer Name:

Sub Data Package Due Date:

Contractor Name:

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

Can be printed on its own page

*** Data Package Instructions ***

Recommended for completed reregistration for para-Dichlorobenzene RED. Please close out this data package after your final review of the label. All reviews, CSF and label are included. Should you have any questions, please Veronica Dutch at 703-308-8585. Thank you.

DATE OUT: 8/27/2013

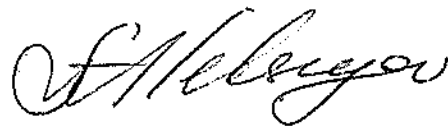
SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [X]

BARCODE NO.: 414347 REG./FILE SYMBOL NO.: 70305-2

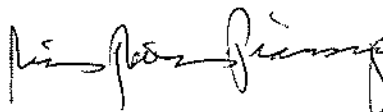
PRODUCT NAME: Paragon Moth Bars and Cakes MRID NOS: 473923-01, 485446-01, and 485447-01

COMPANY NAME: HBC Chemicals, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)



THROUGH: Maria Rivera Piansay, Lead Chemist
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)



TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Revised Reregistration Eligibility Decision (Revised RED), Case No. 3058, was issued on 12/09/2008 for the Active Ingredient Para-dichlorobenzene a.k.a. PDCB. According to the RED, the generic database supporting the reregistration of Para-dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Para-dichlorobenzene RED, HBC Chemicals, LLC provided EPA Form 8570-35 (Data Matrix), dated 01/04/2011; EPA Form 8570-4 (Confidential Statement of Formula), one basic and four alternative formulations, dated 03/10/2010; a draft label, punch date 11/01/2010; a letter to the CRM, dated 10/25/2010; and MRID Nos. 473923-01, 485446-01, and 485447-01. The registrant is requesting reregistration of the product, Paragon Moth Bars and Cakes, EPA Reg. No. 70305-2.

FINDINGS:

1. EPA Reg. No. 70305-2 is an end-use product containing the active ingredient Para-dichlorobenzene (1,4-dichlorobenzene), with a label claim nominal concentration of 99.75%, and other ingredients content of 0.25%. The product is for use in killing moths and carpet beetles. The product is produced by an integrated system.
2. The CSFs for all formulations are acceptable. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
3. Data reported in MRID Nos. 473923-01, 485446-01, and 485447-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2,

~~—THIS REVIEW CONTAINS FIFRA CBI—~~

97-5, and 97-6. There are no data presented that would trigger Physical or Chemical Hazards statements. ✓
 The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 70305-2..

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	CSF	Y
.1600 Description of Materials Used to Produce the Product	158.325	473923-01	Y
.1620 Description of Production Process	158.330	473923-01	Y
.1650 Discussion of Formulation Process	158.165		N/A
.1670 Discussion of Formation of Impurities	158.167	473923-01	Y
.1700 Preliminary Analysis	158.345	473923-01	Y
.1750 Certified Limits	158.350	CSF	Y
.1800 Enforcement Analytical Method	158.355	473923-01	Y

THIS REVIEW CONTAINS FIFRA CBI

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	White	473923-01	Y
.6303 Physical State	Solid	473923-01	Y
.6304 Odor	Pleasant	473923-01	Y
.6313 Stability	PDSB is known to be stable to metal ions and elevated temperature.	473923-01	Y
.6314 Oxidation/Reduction Chemical Incompatibility	PDSBG is chemically inert.	473923-01	Y
.6315 Flammability/Flame Extension	149.9 °F	473923-01	Y
.6316 Explodability	The product is not explosive.	473923-01	Y
.6317 Storage Stability	The product is stable after 12 month at RT.	485447-01	Y
.6319 Miscibility	The product is solid		N/A
.6320 Corrosion Characteristics	No signs of corrosion attack upon containers (plastic bags) after 12 month at RT.	485447-01	Y
.6321 Dielectric Breakdown Voltage	The product is not intended to used around electrical equipment.		N/A
.7000 pH	The product is solid, insoluble in water		N/A
.7050 UV/ Visible Light Absorption	No absorbance in 380-750 nm, peak at 224 nm.	485446-01	Y
.7100 Viscosity	The product is solid		N/A
.7200 Melting Point	53.5 °C	473923-01	Y
.7220 Boiling Point	The product is solid		N/A
.7300 Density/Bulk Density	1.25 g/ml at 20 °C	473923-01	Y
.7370 Dissociation Constant in Water	The product is solid, insoluble in water	473923-01	N/A
.7550 Octanol/ Water Partition Coefficient	The product is solid, insoluble in water	473923-01	N/A
.7840 Solubility to Water and Organic Solvents	Insoluble in water.	473923-01	Y
.7950 Vapor Pressure	80 Pa at 20 °C	473923-01	Y

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived

~~THIS REVIEW CONTAINS FIFRA CBI~~

Confidential Appendix A

830-1550 Product Identity and Composition

EPA Reg. No. 70305-2 is an end-use product produced by the integrated system. The product contains the active ingredient Para-dichlorobenzene with a label claim nominal concentration of 99.75% and other ingredients with a label claim nominal concentration of 0.25%. Nominal concentration and upper/lower certified limits are identified in CSF.

830-1600 Description of Materials Used to Produce the Product

Materials used in the production of EPA Reg. No. 70305-2 are identified in MRID No. 473923-01.

830-1620 Description of Production Process

The manufacturing process for the production of EPA Reg. No. 70305-2 is identified in MRID No. 473923-01.

830-1670 Discussion of Formation of Impurities

Impurities were quantified during a preliminary study. Results are provided in MRID No. 473923-01. The subject product contains [REDACTED] impurity [REDACTED]. The product may also contain a fragrance (see the CSFs).

830-1700 Preliminary Analysis

830-1750 Certified Limits:

The CSF for the basic formulation gives the following certified limits for the active ingredient:

Component	Lower Certified Limit	Nominal Concentration	Upper Certified Limit
	% by weight		
Para-dichlorobenzene	97	99.75	103

Upper and lower limits for the active ingredient are the same as the standard certified limits. [REDACTED] impurity and [REDACTED] inert ingredient were identified on the CSFs.

THIS REVIEW CONTAINS FIFRA CBI

PRODUCT REREGISTRATION

SUPPORTING DOCUMENTATION

FOR

Chem Name: Para-Dichlorobenzene

Reg. No. 70305-2

This supporting documentation (in chronological order) includes:

- ☒ Old labels (identified as "Superseded by label dated xx/xx/xx")
- ☒ Unacceptable CSFs (marked "Not Acceptable" and dated)
- ☒ Product chemistry reviews
- ☒ Acute Toxicity reviews
- ☒ Efficacy reviews (if necessary)
- ☒ 90-day responses to PDCI (Form A and Form B)
- ☒ Administrative forms (Application for Reregistration, Certification to Data Citation, Data Matrix)
- ☒ Correspondence



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 27, 2013

MEMORANDUM:

Subject: Paragon Moth Bars and Cakes
PC Code: 061501
EPA Reg. No.: 70305-2
Document Type: Acute Toxicity Review
MRID Nos.: 405210-01, 414109-01, 422053-01,-02,-03

DP Barcode: 414345
Case No.: 0649
CAS No.: 106-46-7
40 CFR: 158.500

From: Boris Yurchak, Chemist *BY*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Thru: Marquea D. King, Toxicologist
Acting Team Leader *[Signature]*
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

To: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

Applicant: Paragon Household Products
233 Clifton Blvd
Clifton, NJ 07015

FORMULATION FROM EPA Reg. No. 70305-2 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Para-Dichlorobenzene (1,4-dichlorobenzene).....	99.75%
<u>Other Ingredient(s):</u>	0.25%
Total	100.00%

BACKGROUND: In their 8-month response to the Para-Dichlorobenzene RED (061501), the registrant is citing 6 acute toxicity studies to support the reregistration of the subject product, EPA Reg. No. 70305-2. The MRID's are as follows: 405210-01 (81-1), 405210-01 (81-2), 414109-01 (81-3), 422053-01 (81-4), 422053-02 (81-5), and 422053-03 (81-6). The acute oral (81-1) and acute dermal (81-2) studies were conducted by US EPA Health Effects research laboratory, RTP, NC, with a test material identified as "Para-Dichlorobenzene Technical Grade". The acute inhalation study (81-3) was conducted by Bio/dynamics Inc., with a test material identified as "para-dichlorobenzene". The primary eye irritation (81-4), primary dermal irritation (81-5), and dermal sensitization (81-6) studies were conducted by Hill Top Biolabs Inc., which utilized a test material identified as 'para-dichlorobenzene'. After reviewing the CSF and the studies, the Agency will allow the subject product to cite these studies.

RECOMMENDATIONS:

- Most of the acute toxicity studies cited (81-1, 81-2, 81-4, 81-5, and 81-6) were reviewed by RMIB V (B.C. Gregg, 02/17/2012, D398663) and found to be acceptable to support the reregistration of EPA Reg. No. 87108-2 that is substantial similar to the subject product 70305-2.
- An Acute Inhalation Toxicity study (81-3) was waived and assigned to category III by RMIB V review on 01/09/2013 (B. Yurchak, D403769).

The acute toxicity profile for EPA Reg. No. 70305-2 is currently:

Acute Oral	III	Cited (LD ₅₀ : Females: 3,790 mg/kg; Males: 3,863 mg/kg)
Acute Dermal	IV	Cited (LD ₅₀ : Females & Males > 6,000 mg/kg)
Acute Inhalation	III	Cited
Primary Eye	II	Cited
Primary Dermal	III	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING (Residential use):

ID #: 070305-00002 Paragon Moth Bars and Cakes

SIGNAL WORD: **WARNING**

Note: Due to category II of Primary eye and residential use, this product meets the criteria for restricted-use classification.

Causes substantial but temporary eye injury. Harmful if swallowed. Harmful if inhaled. Do not get in eyes or on clothing. Use protective eyewear. Avoid contact with skin. Avoid breathing dust or vapor*. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

* Because of the high vapor pressure, the product transits directly from solid to gas at ambient temperatures

FIRST AID:

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.

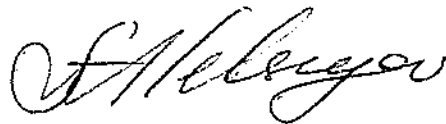
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

DATE OUT: 8/27/2013

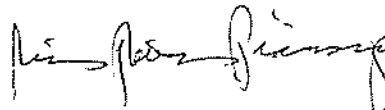
SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI[]; MUP []; EUP [X]

BARCODE NO.: 414347 REG./FILE SYMBOL NO.: 70305-2PRODUCT NAME: Paragon Moth Bars and Cakes MRID NOS: 473923-01, 485446-01, and 485447-01COMPANY NAME: HBC Chemicals, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)



THROUGH: Maria Rivera Piansay, Lead Chemist
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)



TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Revised Reregistration Eligibility Decision (Revised RED), Case No. 3058, was issued on 12/09/2008 for the Active Ingredient Para-dichlorobenzene a.k.a. PDCB. According to the RED, the generic database supporting the reregistration of Para-dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Para-dichlorobenzene RED, HBC Chemicals, LLC provided EPA Form 8570-35 (Data Matrix), dated 01/04/2011; EPA Form 8570-4 (Confidential Statement of Formula), one basic and four alternative formulations, dated 03/10/2010; a draft label, punch date 11/01/2010; a letter to the CRM, dated 10/25/2010; and MRID Nos. 473923-01, 485446-01, and 485447-01. The registrant is requesting reregistration of the product, Paragon Moth Bars and Cakes, EPA Reg. No. 70305-2.

FINDINGS:

1. EPA Reg. No. 70305-2 is an end-use product containing the active ingredient Para-dichlorobenzene (1,4-dichlorobenzene), with a label claim nominal concentration of 99.75%, and other ingredients content of 0.25%. The product is for use in killing moths and carpet beetles. The product is produced by an integrated system.
2. The CSFs for all formulations are acceptable. The certified limits for the active ingredient and the inert ingredients are acceptable in accordance with 40 CFR §158.350. All ingredients are cleared for use in pesticide formulations.
3. Data reported in MRID Nos. 473923-01, 485446-01, and 485447-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.
4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2,

~~THIS REVIEW CONTAINS FIFRA CBI~~

97-5, and 97-6. There are no data presented that would trigger Physical or Chemical Hazards statements. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

Note to PM: Storage and Disposal section should be evaluated for compliance with PR Notice 2007-4.

CONCLUSIONS:

The registrant has satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 70305-2..

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	CSF	Y
.1600 Description of Materials Used to Produce the Product	158.325	473923-01	Y
.1620 Description of Production Process	158.330	473923-01	Y
.1650 Discussion of Formulation Process	158.165		N/A
.1670 Discussion of Formation of Impurities	158.167	473923-01	Y
.1700 Preliminary Analysis	158.345	473923-01	Y
.1750 Certified Limits	158.350	CSF	Y
.1800 Enforcement Analytical Method	158.355	473923-01	Y

~~THIS REVIEW CONTAINS FIFRA CBI~~

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	White	473923-01	Y
.6303 Physical State	Solid	473923-01	Y
.6304 Odor	Pleasant	473923-01	Y
.6313 Stability	PDSB is known to be stable to metal ions and elevated temperature.	473923-01	Y
.6314 Oxidation/Reduction Chemical Incompatibility	PDSBG is chemically inert.	473923-01	Y
.6315 Flammability/Flame Extension	149.9 °F	473923-01	Y
.6316 Explodability	The product is not explosive.	473923-01	Y
.6317 Storage Stability	The product is stable after 12 months at RT.	485447-01	Y
.6319 Miscibility	The product is solid		N/A
.6320 Corrosion Characteristics	No signs of corrosion attack upon containers (plastic bags) after 12 months at RT.	485447-01	Y
.6321 Dielectric Breakdown Voltage	The product is not intended to used around electrical equipment.		N/A
.7000 pH	The product is solid, insoluble in water		N/A
.7050 UV/ Visible Light Absorption	No absorbance in 380-750 nm, peak at 224 nm.	485446-01	Y
.7100 Viscosity	The product is solid		N/A
.7200 Melting Point	53.5 °C	473923-01	Y
.7220 Boiling Point	The product is solid		N/A
.7300 Density/Bulk Density	1.25 g/ml at 20 °C	473923-01	Y
.7370 Dissociation Constant in Water	The product is solid, insoluble in water	473923-01	N/A
.7550 Octanol/ Water Partition Coefficient	The product is solid, insoluble in water	473923-01	N/A
.7840 Solubility to Water and Organic Solvents	Insoluble in water.	473923-01	Y
.7950 Vapor Pressure	80 Pa at 20 °C	473923-01	Y

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived

—THIS REVIEW CONTAINS FIFRA CBI—

Manufacturing process information may be entitled to confidential treatment

Confidential Appendix A

830-1550 Product Identity and Composition

EPA Reg. No. 70305-2 is an end-use product produced by the integrated system. The product contains the active ingredient Para-dichlorobenzene with a label claim nominal concentration of 99.75% and other ingredients with a label claim nominal concentration of 0.25%. Nominal concentration and upper/lower certified limits are identified in CSF.

830-1600 Description of Materials Used to Produce the Product

Materials used in the production of EPA Reg. No. 70305-2 are identified in MRID No. 473923-01.

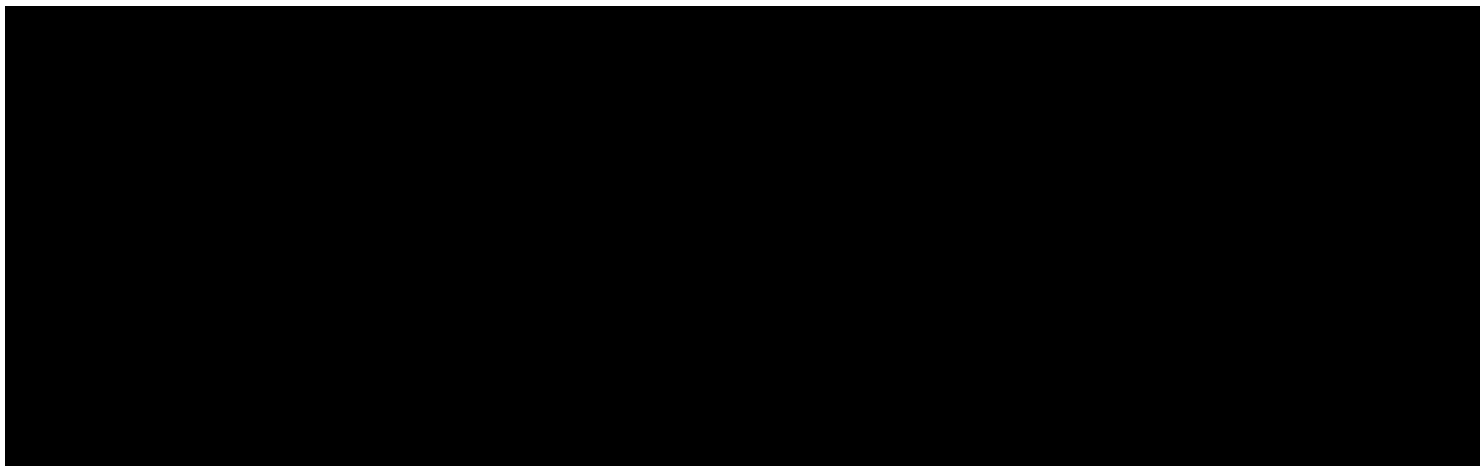
830-1620 Description of Production Process

The manufacturing process for the production of EPA Reg. No. 70305-2 is identified in MRID No. 473923-01.

830-1670 Discussion of Formation of Impurities

Impurities were quantified during a preliminary study. Results are provided in MRID No. 473923-01. The subject product contains [REDACTED] impurity [REDACTED]. The product may also contain a fragrance (see the CSFs).

830-1700 Preliminary Analysis



830-1750 Certified Limits:

The CSF for the basic formulation gives the following certified limits for the active ingredient:

Component	Lower Certified Limit	Nominal Concentration	Upper Certified Limit
		% by weight	
Para-dichlorobenzene	97	99.75	103

Upper and lower limits for the active ingredient are the same as the standard certified limits. [REDACTED] impurity and [REDACTED] inert ingredient were identified on the CSFs.

THIS REVIEW CONTAINS FIFRA CBI

Manufacturing process information may be entitled to confidential treatment

DATE OUT: 12/MAY/2011

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [X]
 BARCODE NO.: D386506 REG./FILE SYMBOL NO.: 51311-3
 PRODUCT NAME: MothGuard Old Fashioned Moth Balls MRID NO.: 473923-01
 COMPANY NAME: HBC Chemical Company ACTION CODE: 676
 CONTRACTOR: CSC PROJECT CODE: PRD-277 OPHI

FROM: Maria Rivera Piansay, Chemist
 Product Chemistry Team
 Risk Management and Implementation Branch V
 Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM
 Risk Management and Implementation Branch V
 Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case number 3058, was issued on September 28, 2007 (revised December 9, 2008) for the Active Ingredient (AI) p-Dichlorobenzene. According to the RED, the generic data base supporting the reregistration of p-Dichlorobenzene for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the p-Dichlorobenzene RED, HBC Chemical Company provided an un-audited summary of storage stability results, dated 9/30/2010; a Confidential Statement of Formula (CSF) for the basic formulation, dated 10/22/2010; CSFs for four alternate formulations, dated 10/20/2010 or 10/22/2010; EPA Form 8570-35 (Data Matrix), dated 10/22/2010; and a draft label (pin-punched 11-01-10) to supplement cited product chemistry data. The registrant cited product chemistry data, including MRID No. 473923-01. The registrant is requesting reregistration of their product, MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3.

FINDINGS:

1. EPA Reg. No. 51311-3 is an end-use insecticide, containing the active ingredient, p-Dichlorobenzene, with a label claim nominal concentration of 99.75%. The product is an insecticide for use in killing carpet beetles and moths and their eggs and larvae. The product is for use in clean, airtight containers (e.g., chests, trunks, garment bags) and storage closets. The product is produced by an integrated system.
2. The CSFs for the basic formulation (dated 10/22/10) and the four alternate formulations (dated 10/20/10) are acceptable. The nominal concentration of the active ingredient agrees with that on the draft label, meeting PR Notice 91-2. The certified limits for the active ingredient and inert ingredients are acceptable in accordance with 40 CFR §158.175(b)(2). All ingredients listed on the CSFs are cleared for use in pesticide formulations.

3. Except for Finding 4, the data reported in MRID No. 473923-01 satisfy the product chemistry requirements under Subgroups A and B, which pertain to Product Identity, Composition, and Analysis, and Physical and Chemical Properties, respectively.
4. The requirements concerning Guideline 830.6317 (Storage Stability) and Guideline 830.6320 (Corrosion Characteristics) are not satisfied. Un-audited interim results demonstrate product stability for 9 months. A final report must be provided. The statement regarding container integrity must be supported with data. Results for a minimum of 1 year from a storage stability and corrosion characteristics study must be provided. The product should be tested in its commercial packaging.

In addition, the requirements concerning Guideline 830.7050 (UV/Visible Absorption) are not satisfied. The UV/visible absorption spectrum of the product must be provided. Data described in OPPTS 830.7050(d) must be submitted, including a recent test spectrum on appropriate reference materials for photometric and wavelength accuracy.

5. The Enforcement Analytical Method for the determination of active ingredient content in the product is presented in MRID No. 473923-01. The method is adequate and satisfies the requirements under Guideline 830.1800.
6. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2 and 97-6. The Physical or Chemical Hazards Statement on the draft label is acceptable. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

[Note to Label Reviewer: The following revisions to the label are recommended: (a) place the Storage and Disposal Statements in a text box for prominence; (b) under the Storage and Disposal Statements, change the Storage subheading to read "Pesticide Storage;" and (c) under the Storage and Disposal Statements, change the Disposal subheading to read "Pesticide Disposal and Container Handling."]

CONCLUSIONS:

After submission of data, as noted in Finding 4, the registrant will satisfy the product chemistry requirements for the reregistration of EPA Reg. No. 51311-3.

Product Chemistry Data**Subgroup A: Guideline Series 830.1550 - 830.1800 (40 CFR §158.320 - 158.355)****Product Identity, Composition, and Analysis**

Guideline Reference No. (GRN) / Title 830	40 CFR §	MRID Number	Data Fulfilled
830.1550 Product Identity and Composition	158.320	CSFs 473923-01 (not current)	Y
830.1600 Description of Materials Used to Produce the Product	158.325	473923-01 and CSFs	Y
830.1620 Description of Production Process	158.330	473923-01	Y
830.1650 Description of Formulation Process	158.335	<i>[Not required for products produced by an integrated system]</i>	NR
830.1670 Discussion of Formation of Impurities	158.340	473923-01	Y
830.1700 Preliminary Analysis	158.345	473923-01	Y
830.1750 Certified Limits	158.350	CSFs 473923-01 (not current)	Y
830.1800 Enforcement Analytical Method	158.355	473923-01	Y

Subgroup B: Guideline Series 830.6302 - 830.7950 (40 CFR §158.310)**Physical and Chemical Properties**

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	White	473923-01	Y
.6303 Physical State	Crystalline flakes/ powder	473923-01	Y
.6304 Odor	Pleasant	473923-01	Y

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6313 Stability to Normal and Elevated Temperature, Metals, and Metal Ions	p-Dichlorobenzene is known to be stable to metal ions and elevated temperatures.	473923-01	Y
.6314 Oxidation/ Reduction: Chemical Incompatibility	p-Dichlorobenzene is chemically inert.	473923-01	Y
	The label states: "This product can damage some plastics, use only in polyethylene or polypropylene containers. Paradichlorobenzene should not be mixed or placed in contact with other moth preventative chemicals."	Label	Y
.6315 Flammability/Flame Extension	149.9°F (65.5°C) (pure active)	473923-01	Y
.6316 Explodability	Not explosive (pure active)	473923-01	Y
.6317 Storage Stability	p-Dichlorobenzene is a highly stable organochlorine compound.	473923-01	---

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled														
.6317 (continued)	<table><tr><th colspan="2">p-Dichlorobenzene</th></tr><tr><th>Time Point</th><th>Active Conc.</th></tr><tr><td>Initial</td><td>97.39%</td></tr><tr><td>3 months</td><td>97.62%</td></tr><tr><td>6 months</td><td>97.62%</td></tr><tr><td>9 months</td><td>98.25%</td></tr><tr><td>12 months</td><td>---</td></tr></table>	p-Dichlorobenzene		Time Point	Active Conc.	Initial	97.39%	3 months	97.62%	6 months	97.62%	9 months	98.25%	12 months	---	Un-audited summary of storage stability results, dated 9/30/2010	U
	p-Dichlorobenzene																
	Time Point	Active Conc.															
	Initial	97.39%															
	3 months	97.62%															
	6 months	97.62%															
	9 months	98.25%															
12 months	---																
Interim results demonstrate stability for 9 months. No significant change in the active ingredient concentration was observed over the 9- month interval. The product was tested in unidentified containers.																	
.6317 (continued)	In progress.	Data Matrix	I														
.6319 Miscibility	Not applicable. p- Dichlorobenzene is a solid.	473923-01	N/A														
	The product is ready-to- use (i.e., is to be applied undiluted).	Label	Y														
.6320 Corrosion Characteristics	Not corrosive.	473923-01	---														
	In progress.	Data Matrix	I														
.6321 Dielectric Breakdown Voltage	Not applicable. The product is not for use on electrical equipment.	473923-01	N/A														
.7000 pH	Not applicable. p- Dichlorobenzene is a water insoluble compound.	473923-01	N/A														
.7050 UV/ Visible Light Absorption			G														

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.7100 Viscosity	0.0889 mPa·s at 55°C; 0.3 mPa·s at 173.9°C (pure active)	473923-01	Y
.7200 Melting Point	53.5°C (pure active)	473923-01	Y
.7220 Boiling Point	173.9°C (pure active)	473923-01	Y
.7300 Density/Relative Density	1.25 g/mL at 20°C (pure active)	473923-01	Y
.7370 Dissociation Constants in Water	Not applicable.	473923-01	N/A
.7550 Octanol/ Water Partition Coefficient	Not applicable.	473923-01	N/A
.7840 Solubility to Water and Organic Solvents	Insoluble in water; 0.016 g/ 100 g water at 60°C (pure active)	473923-01	Y
.7950 Vapor Pressure	80 Pa (0.6 mm Hg) at 20°C (pure active)	473923-01	Y

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradeable; I = Incomplete or in progress; W = Waived; NR = Not required

Enforcement Analytical Method, Guideline 830.1800 (MRID No. 473923-01)

A GC method with flame ionization detection is used to determine active ingredient content in the product ("Determination of Para Dichlorobenzene by Gas Chromatography"). The product is melted to a liquid state and then analyzed. The method provides procedures for preparing samples and a description of the instrument system. This method is found to be adequate and would satisfy Guideline 830.1800.

The GC system consists of the following:

Instrument: GC with Flame Ionization Detector
 Column: 30 m BPX 5 0.32 mm ID
 Carrier Gas: Nitrogen at 30 mL/min
 Injector Temperature: 270°C
 Detector Temperature: 280°C

Temperature Program: 80°C; Hold 2 min
 Ramp to 130°C at 8°C/min
 Hold at 130°C for 1 min
 Ramp to 180°C at 8°C/min
 Hold at 180°C for 0.5 min

Injection Volume: 0.2 μ L
Confidential Appendix A

830.1550 Product Identity and Composition

EPA Reg. No. 51311-3 is an end-use product produced by an integrated system. The product contains the active ingredient, p-Dichlorobenzene, with a nominal concentration of 99.75%. Nominal concentrations and upper/lower certified limits are identified on the CSFs.

830.1600 Description of Materials Used to Produce the Product

The starting materials used in the production of EPA Reg. No. 51311-3 are identified in MRID No. 473923-01. The CSFs identify various fragrances.

830.1620 Description of Production Process

The production process is described in MRID No. 473923-01. [Note that MRID No. 473923-01 includes a chemical reaction equation to supplement the following discussion.]

830.1670 Discussion of Formation of Impurities

As noted in MRID No. 473923-01, the product contains [REDACTED] impurity, o-Dichlorobenzene. The CSFs each list [REDACTED]. The product also may contain [REDACTED].

830.1700 Preliminary Analysis

Results from the preliminary analysis of five batches of the product, p-Dichlorobenzene, are provided in MRID No. 473923-01, and are summarized in the following exhibit. Presumably, active ingredient content was determined by the GC-FID method.

Manufacturing process information may be entitled to confidential treatment

830.1750 Certified Limits

The CSF for the basic formulation, dated 10/22/2010, provides the following certified limits for the active ingredient:

Component	Lower Certified Limit	Nominal Concentration	Upper Certified Limit
	% by weight		
p-Dichlorobenzene	97	99.75	103

Upper and lower certified limits for the active ingredient are standard (or within the standard certified limit range).

THIS REVIEW CONTAINS FIFRA CBI

DATE OUT: 16/FEB/2012

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI [] MUP [] EUP [X]
BARCODE NO.: D398654 REG./FILE SYMBOL NO.: 51311-3
PRODUCT NAME: MothGuard Old Fashioned Moth Balls MRID NOS.: 485447-01, 485446-01
COMPANY NAME: HBC Chemical Company ACTION CODE: 676

FROM: Maria Rivera Piansay, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

TO: Veronica Dutch, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

With this resubmission, in response to our review dated 5/12/11, HBC Chemical Company provided additional product chemistry data pertaining to the Storage Stability, Corrosion Characteristics, and UV/Visible Absorption of the product. The registrant is requesting reregistration of their product, MothGuard Old Fashioned Moth Balls, EPA Reg. No. 51311-3.

FINDINGS:

1. EPA Reg. No. 51311-3 is an end-use insecticide, containing the active ingredient, p-Dichlorobenzene (PDCB), with a label claim nominal concentration of 99.75%. The product is an insecticide for use in killing carpet beetles and moths and their eggs and larvae. The product is for use in clean, airtight containers (e.g., chests, trunks, garment bags) and storage closets. The product is produced by an integrated system.
2. The storage stability test (MRID number 485447-01) was conducted in the original plastic sealed bags inside cardboard boxes. Eleven containers of the test substance were put into storage for one year at ambient laboratory conditions following initial characterization of the active ingredient. The level of active ingredient was determined by Gas Chromatography (GC) at 0, 3, 6, 9, and 12 months. A reference standard was used to quantitate the active ingredient concentration of the test substance. Linearity, precision, and spike recovery were performed to ensure method performance. A one-time screen for benzene hexachloride at a LOD of 0.1 ppm was performed. A detailed description of the analytical test methods was documented at the time of initial characterization. At the end of each storage phase, the appearance of the product and container was observed and recorded. The test substance was in contact with the storage container throughout the storage period.

Prior to storage, the original containers holding the test substance were weighed and the weights recorded. At the end of each test period, the containers were reweighed and the weight recorded. The change in weight of each container was determined.

Results:

Test Substance	Initial	3-month	6-month	9-month	13-month
Moth balls (PARA), Code: MG5	% Para-dichlorobenzene (Mean)				
	97.39	97.62	99.53	98.44	99.69
	% Benzene hexachloride (Mean Impurity)				
	None Detected				

The test substance was found to retain its level of active ingredients when stored at ambient temperature for 13 months. Benzene hexachloride (an impurity of toxicological concern) was not detected in the sample at an LOD of 0.1 ppm. No significant weight change and no change in physical appearance of the test substance were observed. No corrosion of the storage container was observed.

The submitted studies are acceptable. The requirements concerning Guideline 830.6317 (Storage Stability) and Guideline 830.6320 (Corrosion Characteristics) are now satisfied.

3. The UV/Vis spectra and molar absorptivity constant for p-dichlorobenzene were measured and as presented in MRID number 485446-01. The UV/Vis spectra of p-dichlorobenzene provided were referenced in the report. The UV spectra were originally conducted by Hooker Chemical in Niagara Falls. Both target analyte and blank cuvette spectra were pictured.

P-Dichlorobenzene showed no absorbance in the visible spectra (380-750 nm). Maximum absorptivity was shown at 224nm.

The study is acceptable. The requirements concerning Guideline 830.7050 (UV/Visible Absorption) are now satisfied.

4. The Ingredients Statement on the draft label is acceptable as per 40 CFR §156.10(g) and PR Notices 91-2 and 97-6. The Physical or Chemical Hazards Statement on the draft label is acceptable. The Storage and Disposal Statements are acceptable in accordance with 40 CFR §156.10(i)(2)(ix) and PR Notice 83-3.

[Note to Label Reviewer: The following revisions to the label are recommended: (a) place the Storage and Disposal Statements in a text box for prominence; (b) under the Storage and Disposal Statements, change the Storage subheading to read "Pesticide Storage;" and (c) under the Storage and Disposal Statements, change the Disposal subheading to read "Pesticide Disposal and Container Handling."]

CONCLUSIONS:

The registrant has now satisfied the product chemistry requirements for the reregistration of EPA Reg. No. 51311-3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Paragon Household Products 324A Hall Acre Road Cranbury NJ 08512	EPA Registration Number/File Symbol 70305-2
Active Ingredient(s) and/or representative test compound(s) p-Dichlorobenzene	Date 10/25/2010
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Indoor, nonfood	Product Name Para Molt Bars

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHDD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

10/25/2010

Typed or Printed Name and Title

Matthew Brooks, Regulatory Consultant



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

✓ 11-2-10
P. Dickerson Benz

October 25, 2010

To: Veronica Dutch
Chemical Review Manager
Regulatory Management Branch II
Pesticide Re-Evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501

Subject: **ReRegistration of Paragon Moth Bars EPA Reg# 70305-2**
8 Month Response

Dear Ms. Dutch:

Ag-Chem Consulting, on behalf of Paragon Household Products, hereby submits the following 8 month response for the above product.

Included in support of this registration are:

An application;

Two copies of the Confidential Statements of Formula. These CSFs were approved on April 15, 2010; however they erroneously list two countries in box 6. We have recently submitted a notification expanding the number of CSFs for this product from 10 to 20 so we can list box 6 correctly for all alternate formulations.

A Data Citation Certification Form;

A Completed Data Matrix

Five Copies of draft labeling revised as requested in the RED. The label is identical to the one stamped approved on April 15, 2010 except for the addition of the phrase:


IMPORTANT: This product can be harmful to children when ingested. Do not allow children to ingest the product.

As required in the RED for residential products.

This product is identical and from the same producer as MothGuard, EPA Registration number 51311-3. We are running an impurity screen for benzene hexachloride and a storage stability study on that product. We propose to submit those studies to support this product also.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

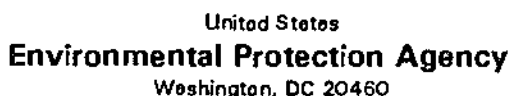
Very Sincerely,


Matthew Brooks
Director, Ag-Chem Consulting LLC
An authorized representative for Paragon Household Products





Form Approved MB No. 2070-0080, Approval expires 2-28-95



	Registration
✓	Amendment
	Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Paragon Household Products/ 70305-2	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Paragon Household Products/ Paragon Moth Bars	PM# 19	
5. Name and Address of Applicant <i>(Include ZIP Code)</i> Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Mo Tea" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

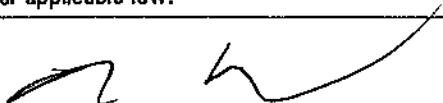
Explanation: Use additional page(s) if necessary. (For section I and Section II.)

8 Month Reregistration Response

Section - III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz		If "Yes" Package wgt. No. per container 6-12	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container			4. Sizes of Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> Printed on box
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other					

Section - IV

1. Contact Point <i>(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)</i>					
Name Matthew Brooks		Title Consultant		Telephone No. (include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) <div style="text-align: right; font-size: 2em;">103</div>
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Matthew Brooks		5. Date 10/25/2010			



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

✓ 5-25-10

March 18, 2010

Document Processing Desk (DCI/PRD)
To: Veronica Dutch
Chemical Review Manager
Regulatory Management Branch II
Pesticide Re-evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington VA 22202

From: Paragon Household Products
Company Number 70305
c/o Matthew Brooks
Ag-Chem Consulting

Subject: 90 Day DCI Response for Product #70305-2, Para Mothballs

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following 90 day response for the above product. This product, EPA Registration number 70305-2, is currently being amended to a new name Para Moth Cakes and will utilize an unregistered of p-dichlorobenzene. The source material is identical both in manufacture and origin to that found in the HBC product, Mothguard, EPA Registration #51311-3. Paragon Household Products has currently submitted a complete selective citation data matrix for this amended product.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

RECEIVED
MAR 24 2010
U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF PESTICIDE PROGRAMS
WASHINGTON, D.C. 20460

MAR 24 2010

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2010-0101
OMB Approval 2010-0051

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address PARAGON HOUSEHOLD PRODUCTS INC 12208 QUINQUE LANE CLIFTON, VA 20124		2. Case # and Name 3058 p-Dichlorobenzene EPA Reg. No. 70305-2		3. Date and Type of DCI and Number 07-Jan-2010 PRODUCT SPECIFIC ID # PDCI-061501-27475					
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	<u>Product Chemistry Data Requirements (Conventional Chemical)</u>								
830.1550	Product identity and composition (1)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.1600	Description of materials used to produce the product (2)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.1620	Description of production process (3)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI	8	6
830.1650	Description of formulation process (4)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.1670	Discussion of formation of impurities (5)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.1700	Preliminary analysis (6, 9, 10)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI	8	6
830.1750	Certified limits (7)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.1800	Enforcement analytical method (8)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.6302	Color (17)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.6303	Physical state (19)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.6304	Odor (20)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <i>John M. ... Regulatory Agent</i>						11. Date 3/18/10			
12. Name of Company <i>Ag - Chem Consulting</i>						13. Phone Number 703-266-1057			

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OM8 Approval 2070-0107
OM8 Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address PARAGON HOUSEHOLD PRODUCTS INC 12208 QUINQUE LANE CLIFTON, VA 20124		2. Case # and Name 3058 p-Dichlorobenzene EPA Reg. No. 70305-2		3. Date and Type of DCl and Number 07-Jan-2010 PRODUCT SPECIFIC ID # PDCI-061501-27475					
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions (11, 12, 48)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI	8	6
830.6314	Oxidizing or reducing action (13)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.6315	Flammability (14)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.6316	Explosibility (15)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.6317	Storage stability of product (47)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	16	6
830.6319	Miscibility (16)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.6320	Corrosion characteristics (49)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	16	6
830.6321	Dielectric breakdown voltage (18)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.7000	pH of water solutions or suspensions (21, 22)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.7050	UV/Visible absorption					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/PAI	8	6
830.7100	Viscosity (27)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	MP/EP	8	6
830.7200	Melting point/melting range (28, 29)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI	8	6

Initial to indicate certification as to information on this page (full text of certification is on page one).

MB

Date 3/18/10

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address PARAGON HOUSEHOLD PRODUCTS INC 12208 QUINQUE LANE CLIFTON, VA 20124		2. Case # and Name 3058 p-Dichlorobenzene EPA Reg. No. 70305-2		3. Date and Type of DCI and Number 07-Jan-2010 PRODUCT SPECIFIC ID # PDCI-061501-27475					
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.7220	Boiling point/boiling range (30,31)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI	8	6
830.7300	Density/relative density (32,33)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/MP/EP	8	6
830.7370	Dissociation constant in water (23,24)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI or PAI	8	6
830.7550	Partition coefficient (n-octanol/water), shake flask method (25)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/PAI	8	6
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography (26)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI/PAI	8	6
830.7840	Water solubility: Column elution method, shake flask method (34)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI or PAI	8	6
830.7860	Water solubility, generator column method (35)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI or PAI	8	6
830.7950	Vapor pressure (36,37)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI or PAI	8	6
<u>Toxicology Data Requirements (Conventional Chemical)</u>									
870.1100	Acute Oral Toxicity (41,50)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI, EP, dilute EP?	8	6
870.1200	Acute dermal toxicity (38,39,51)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI, EP, dilute EP?	8	6
870.1300	Acute inhalation toxicity (40)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI & EP	8	6

Initial to indicate certification as to information on this page
(full text of certification is on page one).

MB

Date

3/18/10

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address PARAGON HOUSEHOLD PRODUCTS INC 12208 QUINQUE LANE CLIFTON, VA 20124		2. Case # and Name 3058 p-Dichlorobenzene EPA Reg. No. 70305-2			3. Date and Type of OCI and Number 07-Jan-2010 PRODUCT SPECIFIC ID # PDCI-061501-27475				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
870.2400	Acute eye irritation (42)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI & EP	8	6
870.2500	Acute dermal irritation (43, 44)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI & EP	8	6
870.2600	Skin sensitization (45, 46)					H, I, K, D, M, A, B, C, J, N, O, E, F, G, L	TGAI & EP	8	6
<p>Initial to indicate certification as to information on this page (full text of certification is on page one).</p> <p style="text-align: center;">/s/ B</p>									
							Date	3/18/10	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Office of Chemical Safety
and Pollution Prevention

March 21, 2013

Ag-Chem Consulting
Dr. Mathew Brooks, Agent for
HBC Chemical, LLC
12208 Quinque Lane
Clifton, VA 20124

Dear Dr. Brooks,

Subject: Change of Name and Ownership of Company Number

Pursuant to your letter dated February 12, 2013 and subsequent information received by the Agency, we have approved the change in name and ownership of **Paragon Household Products, Inc.** company number 70305, to **HBC Chemical, LLC** company number 70305.

Our records are being amended to show the registrant and associated representative under company number 70305 as follows:

HBC Chemical, LLC
324 Half Acre Rd.
Cranbury, NJ 08512

Authorized Contact:

Ag-Chem Consulting
Dr. Mathew Brooks
(706) 266-0128 PH
(706) 266-4377 FAX
mwbrooks01@yahoo.com

The effective date of this change is the date of this letter.

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number,

lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to initiation. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

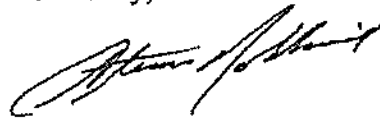
Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section

24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval, please contact Louis Vaughn at (703) 308-8114.

Sincerely,



Steve Robbins, Chief
Information Services Branch (7504P)
Information Technology and Resources Management Division
Office of Pesticide Programs

cc: Ag-Chem Consulting
Dr. Mathew Brooks, Agent for
Paragon Household Products, Inc.
12208 Quinque Lane
Clifton, VA 20124

RE: L_70305_COM_70305_03_21_2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

APR 19 2011

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Chifton, VA 21024

Attention: Matthew Brooks

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your application of February 4, 2011

Purpose The purpose of this submission is to revise your Confidential Statements of Formula (CSF), under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to reflect the correct source of the active ingredient for this product.

CSF You have submitted four (4) CSFs, dated January 4, 2011, one Basic Formulation and three (3) Alternate Formulations, which are acceptable. Copies have been placed in our files. All previous versions are obsolete.

Questions If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

A handwritten signature in black ink, appearing to read "Rosanna Louie-Juzwiak".

Rosanna Louie-Juzwiak
Acting Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

February 4, 2011

To: Document Processing Desk (DCI/PRD)
Daniel Peacock / John Hebert
Biologist/ PM Team 19
Regulatory Management Branch II
Pesticide Re-evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington VA 22202

From: Paragon Household Products
Company Number 70305-2
c/o Matthew Brooks
Ag-Chem Consulting

Subject: Notification of Revised CSFs for Paragon Moth Bars
EPA Registration # 70305-2

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following Notification of a revised basic and alternate CSFs .

On April 15, 2010, the Agency approved CSFs (dated December 10, 2009) for the above product. These CSFs listed 3 production establishments in two different countries. To coincide with this we listed two possible producing countries in box 6.

Since then we have been informed verbally by the Agency that only 1 country can be listed in box 6. This notification removes the United States producers and lists only the [REDACTED] supplier. Box 6 has also been revised to reflect this.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

Product ingredient source information may be entitled to confidential treatment



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

February 4, 2011

To: Document Processing Desk (DCI/PRD)
Daniel Peacock / John Hebert
Biologist/ PM Team 19
Regulatory Management Branch II
Pesticide Re-evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington VA 22202

From: Paragon Household Products
Company Number 70305-2
c/o Matthew Brooks
Ag-Chem Consulting

**Subject: Notification of Revised CSFs for Paragon Moth Bars
EPA Registration # 70305-2**

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Very Sincerely

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

Product ingredient source information may be entitled to confidential treatment



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

✓ 11-2-10
P. Dichlorobenzene

October 25, 2010

To: Veronica Dutch
Chemical Review Manager
Regulatory Management Branch II
Pesticide Re-Evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: **ReRegistration of Paragon Moth Bars EPA Reg# 70305-2
8 Month Response**

Dear Ms. Dutch:

Ag-Chem Consulting, on behalf of Paragon Household Products, hereby submits the following 8 month response for the above product.

Included in support of this registration are:

An application;

Two copies of the Confidential Statements of Formula. These CSFs were approved on April 15, 2010; however they erroneously list two countries in box 6. We have recently submitted a notification expanding the number of CSFs for this product from 10 to 20 so we can list box 6 correctly for all alternate formulations.

A Data Citation Certification Form;

A Completed Data Matrix

Five Copies of draft labeling revised as requested in the RED. The label is identical to the one stamped approved on April 15, 2010 except for the addition of the phrase:


IMPORTANT: This product can be harmful to children when ingested. Do not allow children to ingest the product.

As required in the RED for residential products.

This product is identical and from the same producer as MothGuard, EPA Registration number 51311-3. We are running an impurity screen for benzene hexachloride and a storage stability study on that product. We propose to submit those studies to support this product also.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely,


Matthew Brooks
Director, Ag-Chem Consulting LLC
An authorized representative for Paragon Household Products

511
NOV 02 2010

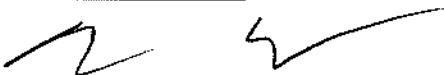


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 25, 2010		EPA Reg No./File Symbol 70305-2		Page 4 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 324 Half Acre Road Cranbury NJ 08512		Product Paragon Moth Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
158.165	Description of formulation process	47920901	Paragon Household Products	Own	
158.167	Discussion of impurities	47920901	Paragon Household Products	Own	
158.170	Preliminary Analysis	47920901	Paragon Household Products	Own	
157.175	Certified Limits	47920901	Paragon Household Products	Own	
158.180	Enforcement Analytical Method	47920901	Paragon Household Products	Own	
158.155	Product Identity and Composition	47920901	Paragon Household Products	Own	
158.160	Description of Materials used to produce the product	47920901	Paragon Household Products	Own	
158.162	Description of Production Process	47920901	Paragon Household Products	Own	
158.165	Description of formulation process-Registered Source	47941301	Paragon Household Products	Own	
158.155	Product Identity and Composition-Registered Source	47941301	Paragon Household Products	Own	
158.160	Description of Formulation Process-Registered Source	47941301	Paragon Household Products	Own	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/25/2010




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date October 25, 2010			EPA Reg No./File Symbol 70305-2		Page 5 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 324 Hall Acre Road Cranbury NJ 08512			Product Paragon Moth Bars and Cakes		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
63-10	Disassociation Constant	47920901	Paragon Household Products	Own	
63-9	Vapor Pressure	47920901	Paragon Household Products	Own	
62-3[830.1670]	Color	47920901	Paragon Household Products	Own	
63-3[830.6303]	Physical State	47920901	Paragon Household Products	Own	
63-4[830.6304]	Odor	47920901	Paragon Household Products	Own	
63-6[830.7220]	Boiling Point	47920901	Paragon Household Products	Own	
63-7[830.7300]	Density	47920901	Paragon Household Products	Own	
63-8[830.7840]	Solubility	47920901	Paragon Household Products	Own	
63-5	Melting Point	47920901	Paragon Household Products	Own	
63-12[830.7000]	pH	47920901	Paragon Household Products	Own	
63-13[830.6317]	Stability	47920901	Paragon Household Products	Own	
63-11	Octanol Water Partition	47920901	Paragon Household Products	Own	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/25/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date October 25, 2010			EPA Reg No./File Symbol 70305-2		Page 1 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 324 Half Acre Road Cranbury NJ 08512			Product Paragon Moth Bars and Cakes		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Tox	40521001	Chlorobenzene Producers Association	Old	In RED
870.1200	Acute Dermal Tox-Rabbit	40521001	Chlorobenzene Producers Association	Old	In RED
870.1300	Acute Inhalation Tox-Rat	41410901	Chlorobenzene Producers Association	Old	In RED
870.2400	Acute Eye Irritation	42205301	Chlorobenzene Producers Association	Old	In RED
870.2500	Acute Dermal Irritation	42205302	Chlorobenzene Producers Association	Old	In RED
870.2600	Skin Sensitization-Guinea Pig	42205303	Chlorobenzene Producers Association	Old	In RED
870.3150	90 Day Oral Toxicity-Rat	43988801	Monsanto Company	Pay	In RED
870.3200	21-Day Dermal Toxicity-Rat	41315001	Chlorobenzene Producers Association	Old	In RED
870.3465	90-Day Inhalation Toxicity- Dog	41822801	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rat	42619601	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rabbit	40568001	Chlorobenzene Producers Association	Old	In RED
870.3800	Reproduction and Fertility Effects-Rat	41108801	Chlorobenzene Producers Association	Old	In RED
830.4100	Chronic Toxicity-Dog	43988802	Monsanto Company	Pay	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Rat	40521005	Chlorobenzene Producers Association	Old	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Mouse	40521005	Chlorobenzene Producers Association	Old	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/25/2010



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number HBC Chemical LLC / 70305-2	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) HBC Chemical LLC / Paragon Moth Bars and Cakes	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

Notification of Revised Basic CSF, and Alternate CSFs

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) plastic bag in box	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label Is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Dr. Matthew Brooks	Title Director, Ag-Chem Consulting	Telephone No. (Include Area Code) 703-266-0128
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant	
4. Typed Name Matthew Brooks	5. Date 10-31-13	

TRANSFER THIS JACKET TO:

Gene Benbow

Jacket #

70305-2 + ~~70305-3~~

This jacket was transferred from:

Gibbs man

DATE:

11/12/2013

TIME:

1415

COMPLETE

Material to be added to an e-Jacket/Jacket

Reg. No. 70305-2

Description: notification

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
- ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification label
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Peacock

Phone: 305-5407 Division: RD

Date: 6/16/2011



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 15, 2011

Paragon Household Products
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Attention: Dr. Mathew Brooks

Decision # 449941
332 5-896148
1300

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your Notification of May 11, 2010

Purpose The Agency has received your submission for Application for Pesticide Notification under Pesticide Registration Notice (PRN) 1998-10, to approve an alternate product brand name:

Common Scents

Review The Registration Division (RD) has conducted a review of this request for its applicability under PRN 1998-10 and has found that the action falls within the scope of this PR Notice.

Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-308-0029 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,

Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

File Location Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, 16gb Flash Drive\Notifications\Letters\Letters DPeacock\70305-2. 5-11-2011, new name OK, ltr 6-15-2011.doc

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC..**

**Common Scents NOTIFICATION
Moth Preventative**

JUN 15 2011

[Optional Language: Original Scented, Cedar Scented,
Lavender Scented, Citrus Scented, Floral Scented]

KILLS MOTHS AND CARPET BEETLES

NET WT.8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75%

OTHER INGREDIENTS:..... 0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No. 51311-IND-001 70305-NJ-001 51311-PA-001

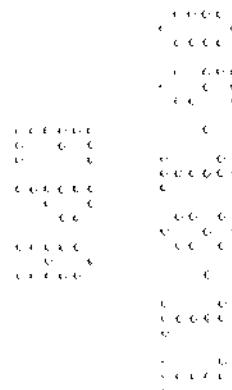
Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**



Back Panel

PRECAUTIONARY STATEMENTS **HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call **1-800-222-1222**.

STORAGE AND DISPOSAL

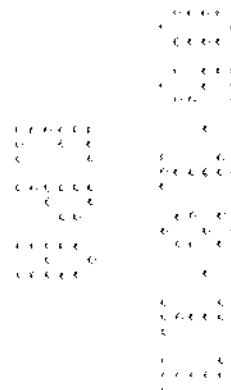
Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

[Statement with ABN: This product contain 2- 3oz cakes]

This product contains 1 -8 oz bar.

Net Wt. 6 oz [or 8 oz]



DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

IMPORTANT: This product can be harmful to children when ingested. Do not allow children to ingest this product.

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

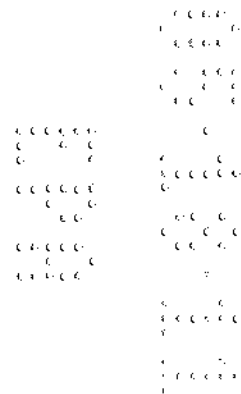
Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.





Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

May 11, 2011

Venus Eagle
Product Manager 01
Insecticide Branch
Registration Division (7505P)
One Potomac Yard (South Building)
2777 S. Crystal Dr.
Arlington Virginia 22202

Subject: Paragon Moth Bars and Cakes
EPA Registration Number 70305-2
Notification of Additional Brand Name

Dear Ms. Eagle:

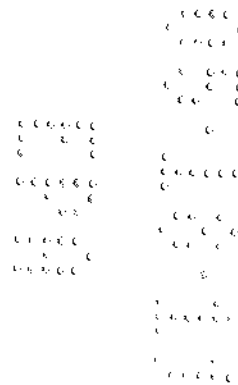
Attached please find a notification to add the additional brand name **Common Scents**.

An example of the proposed additional brand name label is attached.

Please feel free to contact me at 703-266-0128, if you have any questions concerning this submission.

Sincerely,

Matthew W. Brooks, Ph.D.
Ag-Chem Consulting LLC.
Authorized Representative of Paragon Household Products INC.





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Paragon Household Products Inc./70305-2	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> Nonno <input type="checkbox"/> Restricted
4. Company/Product (Name) Paragon Household Products Inc./ Paragon Moth Bars and C	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products Inc. 233 Clifton BLVD. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

NOTIFICATION

Explanation: Use additional pages if necessary. (For section I and Section II.)

JUN 15 2011

Notification of Additional Brand Name Common Scents

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		It "Yes" Unit Packaging wgt.	No. per container	It "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 0.5 oz., 1 oz., 1 gal., 5 gal.		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dr. Matthew Brooks		Title Regulatory Consultant		Telephone No. (Include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) <div style="text-align: right; font-size: 24pt;">127</div>
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Dr. Matthew Brooks		5. Date 05-11-11			

Please Read All Instructions Before Completing this Form (Form must be typed) Form Approved, OMB No. 2070-0044, Approval Expires 12/31/2011



United States
Environmental Protection Agency

Office of Pesticide Programs (7605C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

70303-2

1A 3.2

Distributor Company Number

51311

Note: Do not submit distributor product labels

Name of Registered Product (use product name accepted by EPA)

Paragon Moth Bars

Distributor Product Name

MothGuard Moth Bars

Name and Address of Distributor (Type; include ZIP code)

HBC Chemicals
324A Half Acre road
Granbury NJ 08512

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Signature] Director of Purchasing

Date

4/15/11

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] Reg. Agent

Date

128

Please Read All Instructions Before Completing this Form (Form must be typed) Form Approved. OMB No. 2070-0044, April 2004 Edition



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
70305-2

Distributor Company Number
51311

Note: Do not submit distributor product labels

Name of Registered Product (Basic product name accepted by EPA)
Piragon Moth Bait

Distributor Product Name
MothGuard Moth Cakes

Name and Address of Distributor (Types include ZIP code)
HBC Chemicals
324A Half Acre road
Cranbury NJ 08512

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

[Signature] Director of Packaging

Date

4/15/11

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

[Signature] Reg Agent

Date

4/15/11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Chifton, VA 21024

APR 19 2011

Decision # 447961

*345 5-894195
1155*

Attention: Matthew Brooks

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your application of February 4, 2011

Purpose The purpose of this submission is to revise your Confidential Statements of Formula (CSF), under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) to reflect the correct source of the active ingredient for this product.

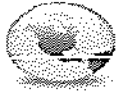
CSF You have submitted four (4) CSFs, dated January 4, 2011, one Basic Formulation and three (3) Alternate Formulations, which are acceptable. Copies have been placed in our files. All previous versions are obsolete.

Questions If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,

Rosanna Louie-Juzwiak
Acting Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Location Dan Peacock, C:\Documents and Settings\dpeacock\Desktop\Backup, I6gb Flash Drive\PDB\Registration Activities\70305-2\70305-2, 2-4-2011, Rev CSF, 1 basic + 3 alt, 4-13-2011.doc



CSFs for 70305-2
Matthew Brooks to: Dan Peacock

02/06/2011 03:29 PM

Hi Dan

The above number refers to Paragon Moth Bars and Cakes. Our original CSFs

In November I filed a notification to correct this but I also added the other registered source and that's when we got into all the issues with the cancelled source.

Attached are CSFs I sent to you in January which only use our approved unregistered source

Can you please substitute the attached CSFs for the November submission and send me a letter approving them so we can import this product?

Thanks

Matt

Matthew Brooks, Ph.D.
703-266-0128 Phone
703-266-4377 Fax
mwbrooks01@yahoo.com

Product ingredient source information may be entitled to confidential treatment



notification letter for 70305-2

Matthew Brooks o Dan Peacock

02/08/2011 10:13 AM

History: This message has been replied to.

Hi Dan
See attached.
-Matt

Matthew Brooks, Ph.D.
703-266-0128 Phone
703-266-4377 Fax



mwbrooks01@yahoo.com Notification letter to Oan Peacock for 70305-2 feb2011.pdf Reg # 70305-2 CSFs Jan2011.pdf



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

February 4, 2011

To: Document Processing Desk (DCI/PRD)
Daniel Peacock / John Hebert
Biologist/ PM Team 19
Regulatory Management Branch 11
Pesticide Re-evaluation Division 7508P
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington VA 22202

From: Paragon Household Products
Company Number 70305-2
c/o Matthew Brooks
Ag-Chem Consulting

**Subject: Notification of Revised CSFs for Paragon Moth Bars
EPA Registration # 70305-2**

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following Notification of a revised basic and alternate CSFs.

On April 15, 2010, the Agency approved CSFs (dated December 10, 2009) for the above product. These CSFs listed 3 production establishments in two different countries. To coincide with this we listed two possible producing countries in box 6.

Since then we have been informed verbally by the Agency that only 1 country can be listed in box 6. This notification removes the United States producers and lists only the [REDACTED] supplier. Box 6 has also been revised to reflect this.

Should you have any questions or require additional information please do not hesitate to contact me at 703-266-0128.

Very Sincerely

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

Product ingredient source information may be entitled to confidential treatment



CSFs for 70305-2
Matthew Brooks to: Dan Peacock

12/15/2010 10:42 AM

Hi Dan

Just to make things more complicated, here are the revised CSFs for 70305-2. I received your letter stating these would be dealt with as an amendment, since the notifications after our discussions were not correct I am glad for this. There are two issues to deal with with this product.

Issue 1:

The CSF we worked on and you approved last year is not correct. It lists 3 establishments in box 2 in the basic and alternate CSFs. Further the establishments are in two different countries so box 6 lists 2 countries which is also not allowed.

CSFs attached and noted as Basic and alternates 1-4 alleviate this by listing only the unregistered source establishment and the product originating at that source [REDACTED]

Issue 2:

Paragon also wants to produce this product in Pennsylvania using the registered [REDACTED] Alternates 5-9 address that issue.

Thanks and I look forward to getting all these CSFs taken care of as soon as possible.

Sincerely
Matt

Matthew Brooks, Ph.D.
703-266-0128 Phone
703-266-4377 Fax
mwbrooks01@yahoo.com



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 9, 2010

Paragon Household Products
c/o Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Decision # 442 332
332 5-886157
1300

Attention: Dr. Mathew Brooks

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your Notification of November 4, 2010

Purpose The Agency has received your submission for Application for Pesticide Notification under Pesticide Registration Notice (PRN) 1998-10, to include ten new Alternate Confidential Statements of Formula (CSF) dated November 4, 2010, that show your proposed new source and associated sites of production.

Review The Registration Division (RD) has conducted a review of this request for its applicability under PRN 1998-10 and has found that the action fails to fall within the scope of this PR notice but must be processed as a "Regular Amendment" for the following reasons.

1. Because of the ongoing transfer of products, new foreign sites of production, and changes in sources that have been occurring with PDB products, we will require more scrutiny of such actions than in the past.
2. Before we can approve this request, you will need to submit CSFs for the Basic Formulation and each Alternative Formulation.
3. You will also have to provide additional documentation about your source and sites of production.

Review-continued Please be advised that the Agency issued PR Notice 1998-10 as guidance and not as regulations. Therefore, the Registration Division reserves the right to make the above determination, to disapprove this action, to cease processing it as a "Notification", and to process it as a "Regular Amendment". We have updated our records accordingly and will inform you of the results of our review, when completed.

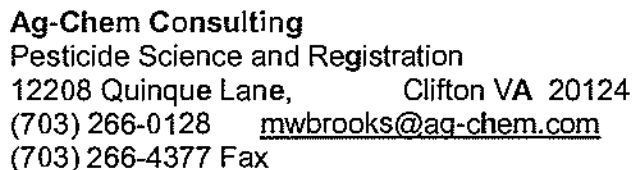
Questions If you have questions about this letter, please contact me at 703-305-5407 (phone); 703-308-0029 (fax); or peacock.dan@epa.gov (E-Mail).

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

File Location Dan Peacock, Flash Drive, 16gb, E:\4G
Dan\Doc\Word\Notifications\Letters\Letters DPeacock\70305-2. Not. 11-4-2010, rev CSF, EPA ltr 12-9-2010.doc



Document Processing Desk (DCI/PRD)
Daniel Peacock/John Hebert
Biologist/PM Team 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Dear Mr. Peacock:

Ag-Chem Consulting, on behalf of Paragon Household Products, submits the following notification to add alternate CSFs numbered 20 through 29. In addition to its own unregistered source, Paragon Household Products purchases registered material from the [REDACTED] reorganized to [REDACTED]. Because of the 18 month period for sales of existing stock, Paragon Household Products has material with both registration numbers. These additional alternate CSFs allow Paragon to use all of its existing labeled stock for source material. Additionally, Paragon produces product in both the US and India. These CSFs further allow for that.

Included with this notification are:
One application 8570-1
Two copies of the proposed CSFs

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products.

$\begin{array}{c} \text{1.} \\ \text{2.} \\ \text{3.} \\ \text{4.} \\ \text{5.} \\ \text{6.} \\ \text{7.} \\ \text{8.} \\ \text{9.} \\ \text{10.} \\ \text{11.} \\ \text{12.} \\ \text{13.} \\ \text{14.} \\ \text{15.} \\ \text{16.} \\ \text{17.} \\ \text{18.} \\ \text{19.} \\ \text{20.} \\ \text{21.} \\ \text{22.} \\ \text{23.} \\ \text{24.} \\ \text{25.} \\ \text{26.} \\ \text{27.} \\ \text{28.} \\ \text{29.} \\ \text{30.} \\ \text{31.} \\ \text{32.} \\ \text{33.} \\ \text{34.} \\ \text{35.} \\ \text{36.} \\ \text{37.} \\ \text{38.} \\ \text{39.} \\ \text{40.} \\ \text{41.} \\ \text{42.} \\ \text{43.} \\ \text{44.} \\ \text{45.} \\ \text{46.} \\ \text{47.} \\ \text{48.} \\ \text{49.} \\ \text{50.} \\ \text{51.} \\ \text{52.} \\ \text{53.} \\ \text{54.} \\ \text{55.} \\ \text{56.} \\ \text{57.} \\ \text{58.} \\ \text{59.} \\ \text{60.} \\ \text{61.} \\ \text{62.} \\ \text{63.} \\ \text{64.} \\ \text{65.} \\ \text{66.} \\ \text{67.} \\ \text{68.} \\ \text{69.} \\ \text{70.} \\ \text{71.} \\ \text{72.} \\ \text{73.} \\ \text{74.} \\ \text{75.} \\ \text{76.} \\ \text{77.} \\ \text{78.} \\ \text{79.} \\ \text{80.} \\ \text{81.} \\ \text{82.} \\ \text{83.} \\ \text{84.} \\ \text{85.} \\ \text{86.} \\ \text{87.} \\ \text{88.} \\ \text{89.} \\ \text{90.} \\ \text{91.} \\ \text{92.} \\ \text{93.} \\ \text{94.} \\ \text{95.} \\ \text{96.} \\ \text{97.} \\ \text{98.} \\ \text{99.} \\ \text{100.} \end{array}$

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United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Paragon Household Products/ 70305-02	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Paragon Household Products/Paragon Moth Bars and Cakes	PM# 19 607	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton VA 20124 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. For section I and Section II.

Notification of addition of alternate CSFs.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged in:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Dr. Matthew Brooks		Title Regulatory Consultant	
		Telephone No. (Include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Consultant	
4. Typed Name Matthew Brooks		5. Date 11-04-10	

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United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Paragon Household Products Inc. / 70305-2	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Paragon Household Products Inc. / PARA MOTHBARS	PM# <u>19</u> <i>CT</i>	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

Notification of Revised Basic CSF, Alternate CSFs, and addition of Alternate CSFs.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40CFR152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	<input type="checkbox"/> Plastic	
		If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Dr. Matthew Brooks	Title Director, Ag-Chem Consulting	Telephone No. (Include Area Code) 703-266-0126	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 	3. Title Regulatory Consultant		
4. Typed Name Matthew Brooks	5. Date 10/25/10		

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 25, 2010		EPA Reg No./File Symbol 70305-2		Page 2 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 324 Half Acre Road Cranbury NJ 08512		Product Paragon Moth Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRIQ Number	Submitter	Status	Note
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Bayer Cropscience	Old	
			Bayer Cropscience	Old	
			Chlorobenzene Producers Association	Old	
			Bayer Cropscience	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
Signature	Name and Title Dr. Matthew Brooks, Director			Date 10/10/25	



Form Approved OMB No. 2070-0060

DATA MATRIX

Page 3 of 5

Paragon Molt Bars and Cakes

[illegible]

10/25/2010



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WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 25, 2010

EPA Reg No./File Symbol 70305-2

Page 1 of 5

Applicant's/Registrant's Name & Address

Paragon Household Products 324 Half Acre Road Cranbury NJ 08512

Product

Paragon Moth Bars and Cakes

Ingredient p-Dichlorobenzene (PC Code 061501)

Guideline Reference Number	Guideline Study Name	MRIQ Number	Submitter	Status	Note
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Monsanto Company	Pay	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Monsanto Company	Pay	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	

Signature

Name and Title

Mr. Matthew Brooks, Director

Date

10/25/2010



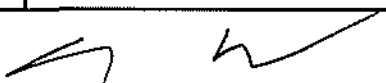
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date October 25, 2010		EPA Reg No./File Symbol 70305-2		Page 2 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 324 Hall Acre Road Cranbury NJ 08512		Product Paragon Molh Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5100	Bacterial Reverse Mutation	40521004	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568002	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568003	Chlorobenzene Producers Association	Old	In RED
870.5275	Sex-Linked Recessive Lethal Test	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521013	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521014	Chlorobenzene Producers Association	Old	In RED
870.5375	Chromosomal Aberration	43368448	Bayer Cropscience	Old	In RED
870.5375	Chromosomal Aberration	43868210	Bayer Cropscience	Old	In RED
870.5375	Cytogenetics-Chromatid Exchange	40521007	Chlorobenzene Producers Association	Old	In RED
870.5395	Mouse Micronucleus assay- Cytogenetics	43368447	Bayer Cropscience	Old	In RED
870.5395	In Vitro Mammalian Cytogenetics Test	40521012	Chlorobenzene Producers Association	Old	In RED
870.5450	Rodent Dominant Lethal Assay	40521011	Chlorobenzene Producers Association	Old	In RED
870.5550	Unscheduled DNA Synthesis	40521008	Chlorobenzene Producers Association	Old	In RED
870.5900	In Vitro Sister Chromatid Exchange Assay	40521007	Chlorobenzene Producers Association	Old	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/10/25



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DATA MATRIX

Date: October 25, 2010 EPA Reg No./File Symbol: 70305-2 Page 4 of 5

Applicant's/Registrant's Name & Address: Paragon Household Products 324 Hall Acre Road Cranbury NJ 08512
Product: Paragon Moth Bars and Cakes

Ingredient: p-Dichlorobenzene (PC Code 061501)

Guideline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	

Signature: [Signature] Name and Title: Dr. Matthew Brooks, Director Date: 10/25/2010




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WASHINGTON, D.C. 20460

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DATA MATRIX

Date: October 25, 2010		EPA Reg No./File Symbol: 70305-2		Page 5 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 324 Half Acre Road Cranbury NJ 08512		Product Paragon Moth Bars and Cakes			
Ingredient: p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
			Paragon Household Products	Own	
Signature 			Name and Title Or. Matthew Brooks, Director		Date 10/25/2010



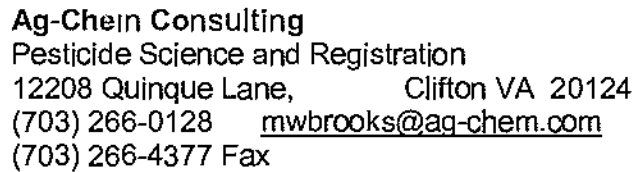
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date: October 25, 2010			EPA Reg No./File Symbol: 70305-2		Page 3 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 324 Hall Acre Road Cranbury NJ 08512			Product Paragon Moth Bars and Cakes		
Ingredient: p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Chlorobenzene Producers Association	Old	
			Recochem Inc.	Old	
				Data Gap	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/25/2010



Kable Bo Davis
Acting Product Manager 07
Insecticide Branch
Registration Division (7505P)
One Potomac Yard (South Building)
2777 S. Crystal Drive
Arlington, VA 22202

Dear Mr. Davis,

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Very Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for Paragon Household Products

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Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

Paragon Moth Bars
[ABN: Paragon Moth Cakes]

APR 15 2010

[Optional Language: Original Scented, Cedar Scented,
Lavender Scented, Citrus Scented, Floral Scented]

KILLS MOTHS AND CARPET BEETLES

NET WT. 8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75%

OTHER INGREDIENTS:..... 0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No. 51311-IND-001 70305-NJ-001 51311-PA-001

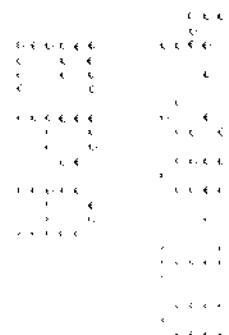
Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

KILLS MOTHS AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015



Back Panel

PRECAUTIONARY STATEMENTS **HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

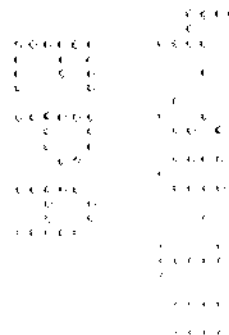
Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

[Statement with ABN: This product contain 2- 3oz cakes]

This product contains 1 -8 oz bar.

Net Wt. 6 oz [or 8 oz]



DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

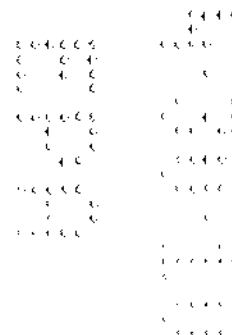
Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.



Material to be added to an e-Jacket/Jacket

Reg. No. 70305-1

Description: Amendment approval

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
- ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:

- ☒ Newly stamped accepted label
- ☐ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Dan Peacock

Phone: 305-5407 Division: RD

Date: 4/15/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Decision 426019 April 15, 2010

Paragon Household Product Inc.
c/o Ag-Chem Consulting
12208 Quinque Lane
Chifton, VA 21024

5-864610 $\frac{R\ 340}{1185}$

5-863233 $\frac{R\ 340}{1185}$

Attention: Matthew Brooks

Subject Paragon Moth Bars
EPA Reg. No. 70305-2
Your application of October 29, 2009

Purpose The purpose of this submission is to revise your Confidential Statements of Formula (CSF) to reflect two new unregistered sources of active ingredient and to add alternate fragrances, to change the form from balls to bars and cakes, and to revise the label for this product.

CSF You have submitted ten (10) CSFs, dated December 10, 2009, which are acceptable. Copies have been placed in our files. All previous versions are obsolete.

Label The labeling submitted with the above letter, under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) is acceptable, provided that:

A. within one (1) year, you submit the following chemistry data for each new source:

a. Discussion of Formulation of Impurities (830.1670)
Note: As required for other registrants of PDB, you have to conduct tests for both sources for the impurity of Benzene Hexachloride (BHC), using a method with a Level of Detection (LOD) sensitivity of 0.1%.

b. UV/Visible Absorption (830.7050)

Label-continued

- B. you submit one (1) copy of final printed labeling to us, with the following change, before you ship your product.
- a. We consider that the primary name for this product to be "Paragon Moth Bars" and alternate name to be "Paragon Moth Cakes".
 - b. At the bottom of Page 2, change the text to read: "This product contains 2-3oz cakes [cake form]. This product contains 1-8oz bar per package [bar form]." Do not include both sentences on a single product.

Existing stocks

Stocks of product with existing labels may be used for eighteen (18) months.

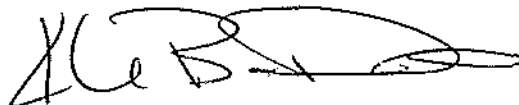
Consequence for non-compliance

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

Questions

If you have questions about this letter, please contact Dan Peacock at 703-305-5407 (by phone), 703-305-6596 (by fax), or peacock.dan@epa.gov (by E-Mail).

Sincerely yours,



Kable Bo Davis
Acting Product Manager (07)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Location

Dan Peacock, Flash Drive, 16gb, E:\4G Dan\Doc\Word\PDB\70305-2\70305-2, Rev CSF, label, 2 new source, new data, 4-14-2010.doc

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

ACCEPTED
With COMMENTS
In EPA Letter Dated:

APR 15 2010

Paragon Moth Bars and Cakes

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

[Optional Language: Original Scented, Cedar Scented, 70305-2
Lavender Scented, Citrus Scented, Floral Scented]

KILLS MOTHS AND CARPET BEETLES

NET WT. 8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75%

OTHER INGREDIENTS:..... 0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No. 51311-IND-001 70305-NJ-001 51311-PA-001

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015

Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

This product contain 2- 3oz disks or 1 -8 oz bars per package.

Net Wt. 6 oz or 8 oz

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.**

Front Panel

Do not stamp
**PARAGON
HOUSEHOLD PRODUCTS INC.
Paragon Moth Bars and Cakes**

*Marked
Copy*

*split
names*

[Optional Language: Original Scented, Cedar Scented,
Lavender Scented, Citrus Scented, Floral Scented]

KILLS MOTHS AND CARPET BEETLES

NET WT. 8 oz [bar]
NET WT 6 oz [2- 3oz cakes]

ACTIVE INGREDIENT:

Paradichlorobenzene.....99.75% *✓*

OTHER INGREDIENTS:.....0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No. 51311-IND-001 70305-NJ-001 51311-PA-001

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**

Back Panel

PRECAUTIONARY STATEMENTS
HAZARD TO HUMANS AND DOMESTIC ANIMALS

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

This product contain 2- 3oz disks or 1 -8 oz bars per package.

Net Wt. 6 oz or 8 oz

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.**

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para
Moth Balls
[ABN: Para Moth Cakes and Bars]**

**[Optional Language: Original Scented, Cedar Scented,
Lavender Scented, Citrus Scented, Floral Scented]**

KILLS MOTHS AND CARPET BEETLES

NET WT. 10 oz (283.5 g)

ACTIVE INGREDIENT:

Paradichlorobenzene..... 99.75%

OTHER INGREDIENTS:..... 0.25%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2

EPA Est. No.

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

[ABN: Para Moth Cakes and Bars]

KILLS MOTHS AND CARPET BEETLES

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**

Back Panel

PRECAUTIONARY STATEMENTS **HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call 1-800-222-1222.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

This product contain **XX 2oz disks or XX 8 oz bars per package.**

Net Wt. YY ZZZ KKK

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.**

FEE

DATE OUT: 25 Mar 2010

SUBJECT: PRODUCT CHEMISTRY REVIEW MP [] EP [x]
DP BARCODE No.: D373015
Reg. File Symbol No.: 70305-2
PRODUCT NAME: Para Moth Balls Cedar Scented
COMPANY: Paragon Household Products, Incorporated
Decision No.: 426019 PC CODE: 061501
FOOD USE: [] Integrated Formulation []

FROM: Bruce F. Kitchens, Chemist
Technical Review Branch
Registration Division (7505P)

Bruce F. Kitchens

25 Mar 2010

SPR 3125/10

TO: RM #07, John Hebert/Daniel Peacock
Insecticide-Rodenticide Branch (7505P)
Registration Division (7505P)

INTRODUCTION:

The registrant, Paragon Household Products, Incorporated, is submitting an application to amend the registered end-use product, Para Moth Balls Cedar Scented. This product will be formed into bars and cakes instead of balls. In addition, the registrant is using an unregistered source of the active ingredient to formulate the basic and several alternate formulas. The active ingredient in this product is p-Dichlorobenzene at a label nominal concentration of 99.75% a.i. This product is intended for use as an insecticide. In support of this request, the registrant has submitted a revised basic and nine alternate Confidential Statements of Formula (CSF) all dated 10 Dec 2009 and product chemistry data contained in MRID#(s) 479209-01 and 479413-01. During the course of this review the registrant submitted revised CSFs dated 10 Mar 2010 to make a clarification regarding the pure active ingredient. The Technical Review Branch (TRB) has been asked to review this submission.

SUMMARY OF FINDINGS

TRB has reviewed this submission and reports the following findings:

1. The basic and four alternate formulas are formulated with an unregistered source of the active ingredient produced [REDACTED]. The remaining alternate formulas are formulated with a registered source of the active ingredient produced [REDACTED].
2. All inert ingredients are approved for use in formulated pesticide products.
[REDACTED] impurity at a level greater than 0.1% has been identified as a component of the active ingredient. No impurities of toxicological concern have been reported.
3. The nominal concentration of the active ingredient listed on the revised basic CSF and the revised label are the same.
4. The revised label contains the appropriate storage and disposal statements.
5. The active ingredient's certified limits as proposed on the basic CSF are acceptable.

Manufacturing process information may be entitled to confidential treatment

Product ingredient source information may be entitled to confidential treatment

6. The registrant's product chemistry data contains the following Quality Assurance Statement:

This study, "Paragon Moth Bars and Cakes Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines", do not meet the requirements of 40 CFR Part 160 and differ in the following ways:

1. No inspections were conducted.
2. No audits were conducted on the raw data or the report.

7. The comparison of the basic and alternate formulas reveals that both formulas have the same active ingredient, the same active ingredient nominal concentration, and similar inert ingredients.

CONCLUSIONS:

TRB has reviewed this submission and concludes the following:

1. The revised basic formula CSF for the end-use product, Paragon Moth Bars and Cakes dated 10 Mar 2010 is acceptable. The revised basic formula contains an unregistered source of the active ingredient. Product chemistry data for the unregistered source of the active ingredient has been reviewed and determined to be acceptable. However, the data requirements for discussion of the formation of impurities will require upgrading. The discussion of the formation of impurities must be included to satisfy this data requirement. The data requirement for UV/Visible absorption must also be addressed in the response. See the confidential appendix for details.

The proposed alternate CSFs for the end-use product, Paragon Moth Bars and Cakes date 10 Mar 2010 are acceptable. Four of the proposed alternate CSFs have an unregistered source of the active ingredient. Product chemistry data for the unregistered source of the active ingredient has been reviewed and determined to be acceptable. However, the data requirement for discussion of the formation of impurities will require upgrading. The discussion of the formation of impurities must be included to satisfy this data requirement. The data requirement for UV/Visible absorption must also be addressed in the response. See the confidential appendix for details.

2. This submission meets the criteria specified in 40 CFR 152.43 with respect to alternate formulations. For future submissions, an alternate CSF will be required for products made or formulated outside the United States. For example, any future submissions which list the [REDACTED] source in box # 2 will require a separate alternate CSF for the [REDACTED]

Product ingredient source information may be entitled to confidential treatment

Enforcement Analytical Method: (MRID No. 479209-01)

The active ingredient, p-dichlorobenzene, was determined by gas chromatography (GC) using flame ionization detection (FID). Approximately 20 mg of sample is heated slowly in a beaker until molten. Concentration of sample is measured against a standard curve of concentrations for p-dichlorobenzene. Method of impurity analysis not included in this submission. Method validation was not provided in this submission.

Equipment and Parameters

Instrument:	Gas chromatograph (GC)
Detector:	Flame ionization detector (FID)
Detector Temperature:	270°C
Injector Temperature:	280°C
Column:	30m BPX 5 X 0.32mm i.d.
Carrier gas:	Nitrogen 30 ml/min
Sample Size:	0.2 µl
Temperature Program:	80°C Hold 2 minutes Ramp to 130°C at 8°C/min Hold at 130°C for 1 minute Ramp to 180°C at 8°C/minute Hold at 180°C for 0.5 minutes

Product ingredient source information may be entitled to confidential treatment

CONFIDENTIAL APPENDIX

DP BARCODE No.: D373015 Reg. File Symbol No.: 70305-2
PRODUCT NAME: Para Moth Balls Cedar Scented
Reviewer: BKitchens Company: Paragon Household Products, Inc.

1. The discussion of the formation of impurities must be expanded to include a discussion the formation of the impurity. Also, include in the discussion an analysis of the presence of hexachlorobenzene since this is an impurity of toxicological concern. The enforcement analytical method must be revised to reflect the method used to analyze for impurities.
2. Below is the product chemistry data for the unregistered source of the active ingredient, p-dichlorobenzene, produced in [REDACTED] This data is contained in MRID# 479209-01.

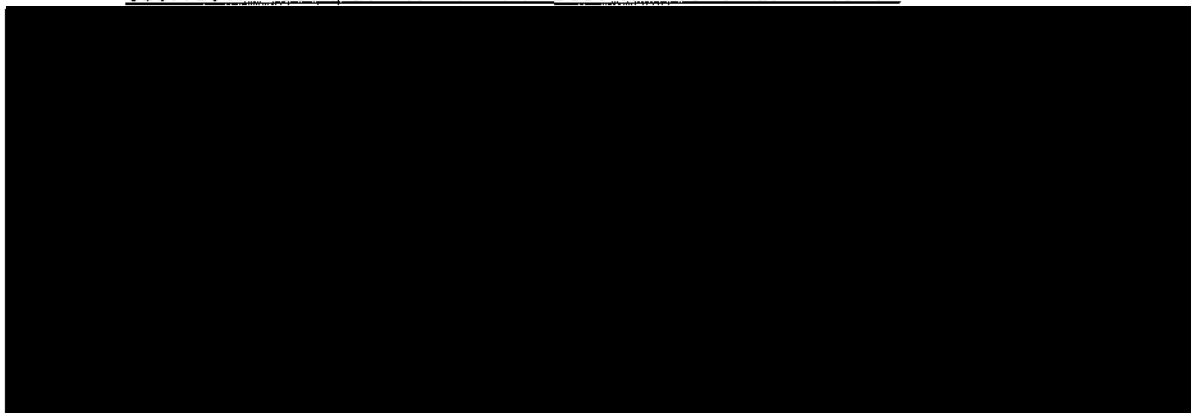
830.155Product identity & Composition:

Common Name: para Dichlorobenzene
Chemical Name (CAS): p-dichlorobenzene
CAS No.: 106-46-7
PC Code No.: 061501
Empirical formula: $C_6H_4Cl_2$
Molecular Weight: 147
Structural formula:



p-Dichlorobenzene

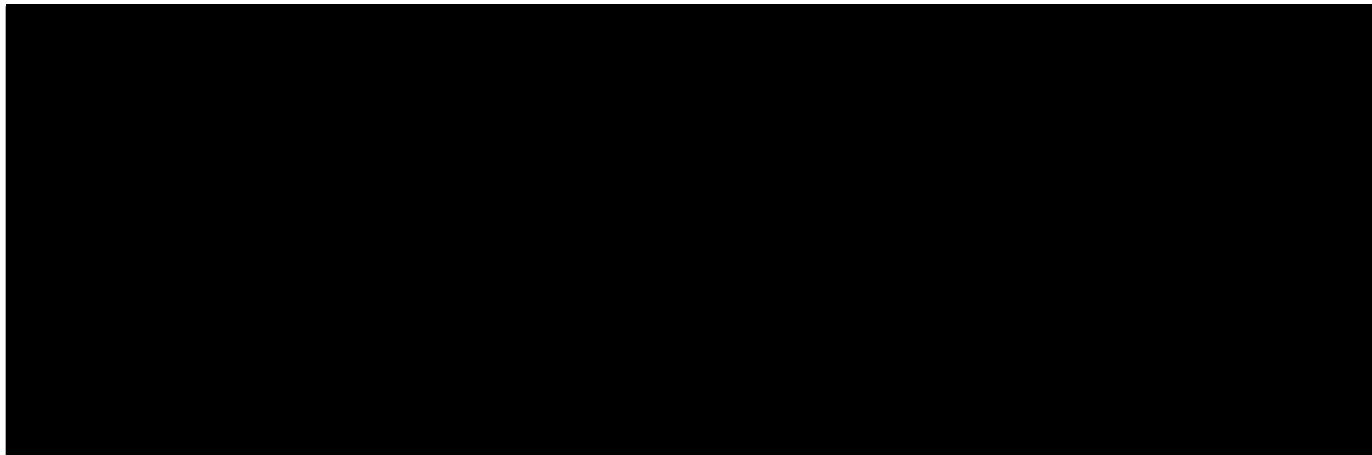
830.1600. Description of Materials Used to Produce the Product:



CONFIDENTIAL APPENDIX

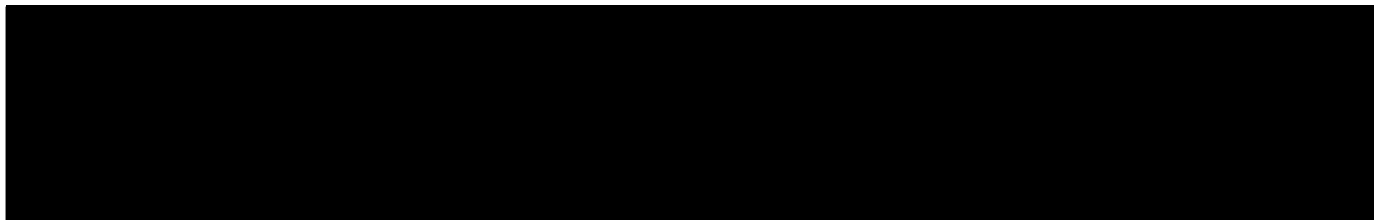
DP BARCODE No.: D373015 Reg. File Symbol No.: 70305-2
PRODUCT NAME: Para Moth Balls Cedar Scented
Reviewer: BKitchens Company: Paragon Household Products, Inc.

830.1620. Description of Production Process:

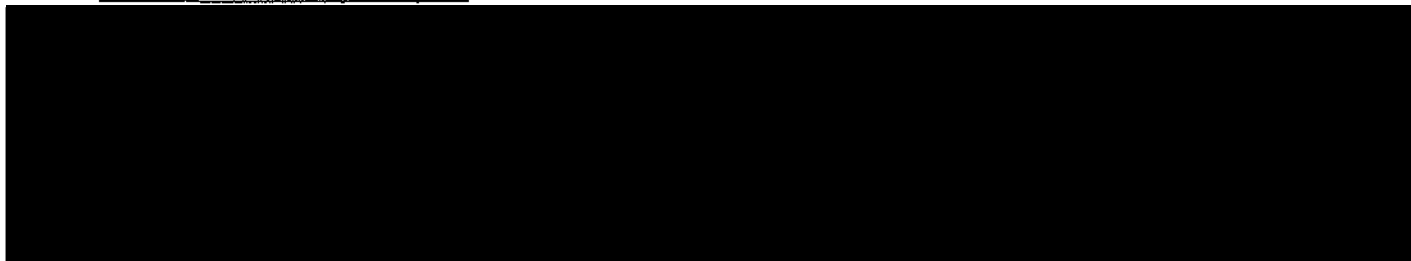


830.1670. Discussion on the formation of Impurities:

Details of the formation of impurities were not included in this submission. The registrant has provided material specifications which detail the components of the active ingredient.



830.1700 Preliminary Analysis:



CONFIDENTIAL APPENDIX

DP BARCODE No.: D373015 Reg. File Symbol No.: 70305-2
 PRODUCT NAME: Para Moth Balls Cedar Scented
 Reviewer: BKitchens Company: Paragon Household Products, Inc.

Table 1. Manufacturing and Impurity Data for p-Dichlorobenzene				
GLN	Requirement	MRID	Status	Details and /or Deficiency
830.1550	Product Identity and composition	479209-01	A	The NC of AI (99.84%) is supported by 5 analyses. Impurity ($\geq 0.1\%$) is listed on the CSF.
830.1600	Description of materials used to produce the product	479209-01	A	No specification sheets (MSDS) for the starting materials was provided by the registrant.
830.1620	Description of production process	479209-01	A	The AI was produced in a three step integrated process. The production process has been described in full details.
830.1670	Discussion of formation of impurities	479209-01	U	The registrant has provided the quantification and identification of impurity present at levels of $\geq 0.1\%$ and is listed on the CSF. No impurity of tox concern was reported in the discussion.
830.1700	Preliminary analysis	479209-01	A	The registrant has provided 5 analysis of the AI. The AI & impurities were identified and quantified by using gas chromatography (GC) method. The method was not validated. The five batch analysis supported the CSF for basic formulation.
830.1750	Certified limits	See csf 3/10/10	A	The proposed certified limits for the AI & for the impurities are based on the five batch analytical results.
830.1800	Enforcement analytical method	479209-01	A	A GC method was used for the determination of the AI content.
A = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = in progress or need upgrade; U = Up-grade (additional information required)				

DP BARCODE No.: D373015 Reg. File Symbol No.: 70305-2
 PRODUCT NAME: Para Moth Balls Cedar Scented
 Reviewer: BKitchens Company: Paragon Household Products, Inc.

830 Series Subgroup B (Physical-Chemical Properties)

Table 2: Physical and Chemical Properties				
GLN	Requirement	MRID	Status	Result or Deficiency
830.6302	Color	479209-01	Y	White
830.6303	Physical state	479209-01	Y	Solid
830.6304	Odor	479209-01	Y	Pleasant or fragranced
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	479209-01	Y	Para-Dichlorobenzene is known to be stable to metal ions and elevated temperatures.
830.6314	Oxidation/reduction; chemical incompatibility	479209-01	Y	The compound is chemically inert.
830.6315	Flammability	479209-01	Y	149.9°C
830.6316	Explosibility	479209-01	Y	Not explosive
830.6317	Storage stability	479209-01	Y	Para-dichlorobenzene is a highly stable organochlorine compound.
830.6319	Miscibility	479209-01	Y	Chemical is a solid
830.6320	Corrosion characteristics		NA	Not corrosive
830.7000	pH		NA	Product is insoluble in water
830.7050	UV/Visible absorption		G	Not addressed
830.7100	Viscosity		NA	Product is a solid
830.7200	Melting point	479209-01	Y	53.5°C (128.3°F)
830.7220	Boiling point		NA	Product is a solid
830.7300	Density	479209-01	Y	1.25 g/ml @ 20°C
830.7370	Dissociation constants in water		NA	
830.7550	Partition coefficient		NA	
830.7840	Water solubility:	479209-01	Y	0.016g/100g water @ 60°C
830.7950	Vapor pressure	479209-01	Y	80 Pa (0.6 mm Hg) at 20°C

Y = Acceptable; N = unacceptable (see Deficiency); N/A = Not Applicable; G = Data gap; I = In progress or need upgrade;
 U = Up-grade (additional information required)

DATA PACKAGE BEAN SHEET

Date: 13-Jan-2010

Page 1 of 2

Decision #: 426019

DP #: (373015)

PRIA

Parent DP #:

Submission #: 864610

*** Registration Information ***

Registration: 70305-2 - PARA MOTH BALLS CEDAR SCENTED

Company: 70305 - PARAGON HOUSEHOLD PRODUCTS INC

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# PY1 S-9751

Risk Manager Reviewer: Daniel Peacock DPEACOCK

Sent Date: 28-Dec-2009

Calculated Due Date: 21-Apr-2010

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R340) NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEME

Ingredients: 061501, Paradichlorobenzene(99.9%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Jan-2010

Due Back: _____

DP Ingredient: 061501, Paradichlorobenzene

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 22-Mar-2010

Team Name: _____

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Chemist:

Please review the attached 2 data sets for new unregistered sources of active ingredient (479209-01 and 479413-01) for this product.

The company's current source will no longer be available.

The company is also changing the form of this product from a "ball" to "bar" and "cake" forms.

For this reason, I am request them to submit some additional product chemistry data to support this change in product form.

As soon as I receive these data from agent, Dr. Mathew Brooks, I will attach those data to the 2 sets of data sent with this request.

The company has also submitted 10 CSF (5 variations, each from 1 of 2 sources, $2 \times 5 = 10$)

The five variations are different fragrances, for which Dr. Brooks claims he has received clearance previously. They have not been reviewed by an inerts chemist.

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The company will have to change the name of this product because, when approved, the product would be misbranded.

Attached are the following documents:

1. application form, dated 10-29-2009
2. cover ltr, 11-3-2009
3. ltr of Dec 10, 2009
4. proposed label, dated 12-10-2009
5. Telephone Memo, date 12-4-2009 and Follow-up
6. CSF, previous one, dated 1-13-2006
7. New CSF, 10 variations, dated 12-10-2009
8. Chemistry Data for 2 new sources: 479209-01 and 479413-01

If you have any questions, please contact me,

Dan Peacock, 305-5407

MRID	MRID Status	Citation Reference	Guideline
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	111-222/
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.1600/Description of materials used to produce the product
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.1670/Discussion of formation of impurities
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7950/Vapor pressure
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7200/Melting point/melting range
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7860/Water solubility, generator column method
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6302/Color
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.1650/Description of formulation process
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47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.7300/Density/relative density
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.1750/Certified limits
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7220/Boiling point/boiling range
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.6315/Flammability
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.7860/Water solubility, generator column method

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47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.1550/Product Identity and composition
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.7950/Vapor pressure
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47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6320/Corrosion characteristics
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.1670/Discussion of formation of impurities
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47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.8313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions

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47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6314/Oxidizing or reducing action
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7300/Density/relative density
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.8303/Physical state
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7840/Water solubility: Column elution method, shake flask method
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47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6304/Odor
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.6302/Color
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	111-222/
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47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.6317/Storage stability of product
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.1600/Description of materials used to produce the product
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	930.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.6303/Physical state
47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.7220/Boiling point/boiling range

DATA PACKAGE BEAN SHEET

Date: 13-Jan-2010

Page 1 of 2

Decision #: 426019

DP #: (373015)

PRIA

Parent DP #:

Submission #: 864610

*** Registration Information ***

Registration: 70305-2 - PARA MOTH BALLS CEDAR SCENTED

Company: 70305 - PARAGDN HDUSEHDLD PRDDUCTS INC

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# PY1 S-9751

Risk Manager Reviewer: Daniel Peacock DPEACDCK

Sent Date: 28-Dec-2009

Calculated Due Date: 21-Apr-2010

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (R340) NDN-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENT)

Ingredients: 061501, Paradichlorobenzene(99.9%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 13-Jan-2010

Due Back: _____

DP Ingredient: 061501, Paradichlorobenzene

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 22-Mar-2010

Team Name: Chem

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

Printed on Page 2

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Chemist:

Please review the attached 2 data sets for new unregistered sources of active ingredient (479209-01 and 479413-01) for this product.

The company's current source will no longer be available.

The company is also changing the form of this product from a "ball" to "bar" and "cake" forms.

For this reason, I am request them to submit some additional product chemistry data to support this change in product form.

As soon as I receive these data from agent, Dr. Mathew Brooks, I will attach those data to the 2 sets of data sent with this request.

The company has also submitted 10 CSF (5 variations, each from 1 of 2 sources, 2 x 5 = 10)

The five variations are different fragrances, for which Dr. Brooks claims he has received clearance previously. They have not been reviewed by an inerts chemist.

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The company will have to change the name of this product because, when approved, the product would be misbranded.

Attached are the following documents:

1. application form, dated 10-29-2009
2. cover ltr, 11-3-2009
3. ltr of Dec 10, 2009
4. proposed label, dated 12-10-2009
5. Telephone Memo, date 12-4-2009 and Follow-up
6. CSF, previous one, dated 1-13-2006
7. New CSF, 10 variations, dated 12-10-2009
8. Chemistry Data for 2 new sources: 479209-01 and 479413-01

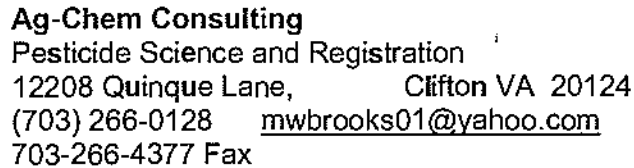
If you have any questions, please contact me,

Dan Peacock, 305-5407

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47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.1600/Description of materials used to produce the product
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47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7200/Melting point/melting range
47941301		Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.7860/Water solubility, generator column method
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47920901		Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.1750/Certified limits
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47920901	Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6314/Oxidizing or reducing action	
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47920901	Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.1600/Description of materials used to produce the product	
47920901	Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.6313/Stability to sunlight, normal and elevated temperatures, metals, and metal ions	
47941301	Brooks, M. (2009) Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR002. Unpublished study prepared by Ag-Chem Consulting. 20 p.	830.6303/Physical state	
47920901	Brooks, M. (2009) Para Moth Balls, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines. Project Number: PAR001. Unpublished study prepared by Ag-Chem Consulting, LLC. 23 p.	830.7220/Boiling point/boiling range	



To: Daniel Peacock/ Bruce Kitchens
Biologist/ Team 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: Revised CSFs for Paragon Moth Bars and Cakes
EPA Registration #70305-2

Matthew Brooks
Director, Ag-Chem Consulting LLC
An Authorized Representative for Paragon Household Products

[illegible]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

*File
copy*

January 12, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-426019
EPA File Symbol or Registration Number: 70305-2
Product Name: PARA MOTH BALLS CEDAR SCENTED
EPA Receipt Date: 30-Nov-2009
EPA Company Number: 70305
Company Name: PARAGON HOUSEHOLD PRODUCTS INC

MATTHEW BROOKS, PH.D.
AG-CHEM CONSULTING
PARAGON HOUSEHOLD PRODUCTS INC
12208 QUINQUE LANE
CLIFTON, VA 20124-

SUBJECT: Receipt of Registration Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your amendment and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee
Ombudsman at (703) 305-6249.

Sincerely,


Front End Processing Staff
Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 1, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MATTHEW BROOKS, PH.D.
AG-CHEM CONSULTING
PARAGON HOUSEHOLD PRODUCTS INC
12208 QUINQUE LANE
CLIFTON, VA 20124-

PRODUCT NAME: PARA MOTH BALLS CEDAR SCENTED
COMPANY NAME: PARAGON HOUSEHOLD PRODUCTS INC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 70305-2
EPA RECEIPT DATE: 11/30/09

SUBJECT: RECEIPT OF AMENDMENT

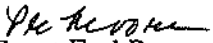
DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 308-6249.

Sincerely,


Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Online Payment**Step 3: Confirm Payment**

1 | 2 | 3

Thank you.**Your transaction has been successfully completed.****Pay.gov Tracking Information**

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 2501OQGA

Agency Tracking ID: 74090048078

Transaction Date and Time: 11/24/2009 13:28 EST

Payment Summary

Address Information	Account Information	Payment Information
Account Holder Name: Matt Brooks	Card Type: Master Card	Payment Amount: \$3,444.00
12208 Quinque	Card Number: *****4884	Transaction Date 11/24/2009
Billing Address: Lane	Decision Number:	and Time: 13:28 EST
Billing Address 2:	Registration Number: 70305-2	
City: Clifton	Company Paragon	
State / Province: VA	Name: Household Product	
Zip / Postal Code: 20124	Company Number: 70305	
Country: USA	Action Code: R340	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 5, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PARAGON HOUSEHOLD PRODUCTS INC
12208 QUINQUE LANE
CLIFTON, VA 20124-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 22-DEC-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



70305-2, Para Cedar Scented Moth Balls
Molly Clayton to: Dan Peacock

03/16/2010 01:13 PM

Hi Dan,

I see that you have the jacket for 70305-2 checked out.

I need to find out what technical product Paragon is using to formulate their two end use para-dichlorobenzene products. Specifically, I need to find out if the tech product is registered with EPA or if it is an unregistered source. Would you please check the CSF in 70305-2 and let me know?

I looked in 70305-1 (Para Mothballs), and it looks like for this product, Paragon used to buy technical from [REDACTED] but then switched over to buying an unregistered technical product from [REDACTED]. Can you verify that for me?

Thank you!

Molly Clayton
Chemical Review Manager
Pesticide Re-evaluation Division
Risk Management & Implementation Branch 3 (RMIB3)
USEPA 7508P
Ariel Rios Building
1200 Pennsylvania Avenue N.W.
Washington D.C. 20460
Phone: 703-603-0522 /Fax: 703-308-8090

CHEMICAL NAME/PESTICIDE CHEMICAL CODE (PCC)

REQUEST FORM

CR# 10-123

REQUESTOR NAME: <u>Bruce Kitchens</u>		Request date: <u>10 MAR 2010</u>	
Tel: <u>308-9372</u>	ORG.: <u>RD/TRB</u>	CUBE: <u>S 7331</u>	MAIL CODE: <u>7505D</u>

CSF ATTACHED:

- ☒ YES If CSF is attached complete Item A and the chemical name in item C.
☐ NO If CSF is not attached complete Item A through C.

A. INFORMATION REQUIRED:

- ☒ Check Applicable Category
☐ Provide PCC and Tolerance Exemption Status For Food-Use Inert ingredient (s).
☒ Provide PCC for Non-Food Use inert Ingredient (s).
☐ Provide PCC for Active Ingredient (s).
☐ Provide PCC for Dye.
☐ Determine if Fragrance is Acceptable for Use In Formulation.
☐ Other (Describe): _____

B. PESTICIDE PRODUCT INFORMATION: See CSFs

EPA Reg. No/File Symbol: <u>70305-2</u>	Product Name: <u>Para Moth Balls Cedar Scented</u>
Registrant: <u>Paragon Household Products, Inc.</u>	Food-Use Pesticide: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Percent in Formulation (For Fragrance _____ /Dyes _____)	

C. INGREDIENT INFORMATION:

Ingredient No.1

INFORMATION REPORTED:

Chem. Name:	PCC: <u>~</u>
Trade Name:	TOL. STATUS:
CAS Reg. No.:	OTHER INF.:

Ingredient No.2:

Chem. Name:	PCC:
Trade Name:	TOL. STATUS:
CAS Reg. No.:	OTHER INF.:

Ingredient No.3

Chem. Name:	PCC:
Trade Name:	TOL. STATUS:
CAS Reg. No.:	OTHER INF.:

Ingredient No.4:

Chem. Name:	PCC:
Trade Name:	TOL. STATUS:
CAS Reg. No.:	OTHER INF.:

Completed By: A. RuchDate Completed: 3/10/10



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

December 10, 2009

To: **Daniel Peacock/ John Hebert**
Product Manager/ Team 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: **Amendment to Para Moth Balls to rename Paragon Moth Bars and Cakes**
EPA Registration #70305-2

Dear Mr. Peacock;

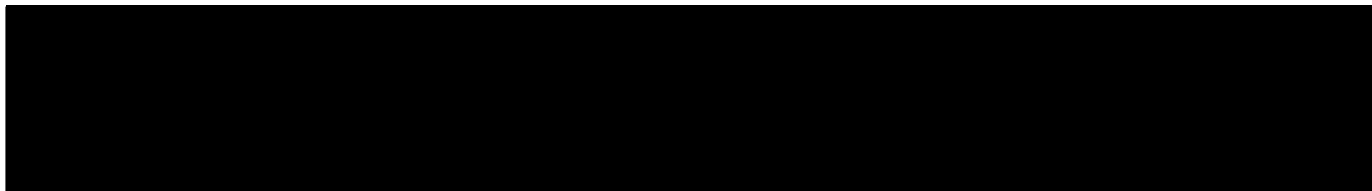
Ag-Chem Consulting, on behalf of Paragon Household Products (233 Clifton blvd., Clifton NJ 07015), hereby submits the following revisions as per our phone conversation.

Enclosed please find:

- 1- Revised CSFs listing all establishment numbers where the product will be produced.
- 2- Revised data matrix
- 3- Revised labeling with new name

Additionally, under separate cover, we have submitted an additional product chemistry report describing the formulation process using a registered source of active ingredient.

Lastly as requested below is a table of the sizes of the bars and cakes. This information is also listed on page 7 of the confidential attachment in MRID#47920901 and page 6 of PAR002 (a second product chemistry report submitted with these revisions).



Packaging:

Each bar and cake are sold individually wrapped in cellophane. Bars are sold singly and cakes are packed as a pair in a cardboard sleeve.

As always I look forward to working with you on this registration. Please do not hesitate to contact me at 703-266-0128 should you require additional information.

Very Sincerely,

Matthew Brooks
Director, Ag-Chem Consulting LLC
An Authorized Representative for Paragon Household Products

Telephone Call of December 4, 2009 with Mathew Brooks and Follow-Up Application of October 29, 2009, PRIA II Due Date, April 21, 2010		
Subject	Para Moth Balls [ABN: Para Moth Cakes and Bars] EPA Reg. No. 70305-2 Revised CSF, New Chemistry Data, and Revised Label, NFT Amendment	
Purpose	<ol style="list-style-type: none"> 1. Change Form: Balls to bars and cakes 2. Revised Label 3. Add Unregistered Sources: New Data for Two (2) New Sources 4. Revise CSF: Add Fragrances 	
Review	Questions	Answers
	What is contact for this product?	Mathew Brooks Tel 703-266-0128
	Do they need product specific data on the end-use product?	Yes
	What are the sizes and dimensions of the bars and cakes?	Bars: 8oz, 5 x 2-1/14 inches; Cakes: 2 oz, 2 inches in diameter
	What is establishment for HBC Chemicals in Philadelphia, Pa?	51311-PA-0001
	Will the company have to change their product name from "Para Moth Balls" since the product will no longer be a "ball" product?	Yes. They need to change the basic and alternate product names to: Para Moth Cakes and Para Moth Bars
Follow-Up	Mathew Brooks needs to do the following: <ol style="list-style-type: none"> 1. send us the end-use chemical data 2. send us a letter giving a table with the weights, sizes and dimensions of the bars and cakes, 3. send us a revised CSF with correct establishment number for HBC Chemicals (submitted, date 12-10-2009) 4. send us a revised label with new names without "Moth Balls" (not sent) and new forms without references to "moth balls". 	
	Dan Peacock needs to do the following: <ol style="list-style-type: none"> 1. have to give CSF to chemist. 	

Dan Peacock, Flash Drive, 16g , E:\4G Dan\Doc\Word\PDB\70305-2\70305-2, Rev CSF, label, 2 new source, new data, 10-29-2009, Analysis 12-4-2009.doc

Fee for Service

{863233E~

This package includes the following

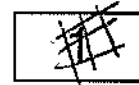
- ☐ New Registration
- ☒ Amendment

☒ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr.



7
15

Receipt No.

S-

863233

EPA File Symbol/Reg. No.

70305-2

Pin-Punch Date:

11/30/2009

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

R340

Granted:

N/A

Amount Due: \$ ____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: [Signature]

Date: 12/1/09

Remarks:

MH7 VRB

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: Autumn

EPA Reg. Number: <u>70305-2</u>		EPA Receipt Date: <u>11/30/09</u>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	✓		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	✓		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?	✓		
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			✓
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]	✓		
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	✓		
	Comments:			

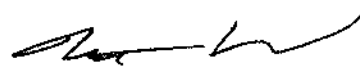


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved DMB No. 2070-0060

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DATA MATRIX

Date December 10, 2009		EPA Reg No./File Symbol 70305-2		Page 1 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015		Product Paragon Moth Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Tox	40521001	Chlorobenzene Producers Association	Old	In RED
870.1200	Acute Dermal Tox-Rabbit	40521001	Chlorobenzene Producers Association	Old	In RED
870.1300	Acute Inhalation Tox-Rat	41410901	Chlorobenzene Producers Association	Old	In RED
870.2400	Acute Eye Irritation	42205301	Chlorobenzene Producers Association	Old	In RED
870.2500	Acute Dermal Irritation	42205302	Chlorobenzene Producers Association	Old	In RED
870.2600	Skin Sensitization-Guinea Pig	42205303	Chlorobenzene Producers Association	Old	In RED
870.3150	90 Day Oral Toxicity-Rat	43988801	Monsanto Company	Pay	In RED
870.3200	21-Day Dermal Toxicity-Rat	41315001	Chlorobenzene Producers Association	Old	In RED
870.3465	90-Day Inhalation Toxicity-Dog	41822801	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rat	42619601	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rabbit	40568001	Chlorobenzene Producers Association	Old	In RED
870.3800	Reproduction and Fertility Effects-Rat	41108801	Chlorobenzene Producers Association	Old	In RED
830.4100	Chronic Toxicity-Dog	43988802	Monsanto Company	Pay	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Rat	40521005	Chlorobenzene Producers Association	Old	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Mouse	40521005	Chlorobenzene Producers Association	Old	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 12/10/2009



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WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 10, 2009

EPA Reg No./File Symbol 70305-2

Page 2 of 5

Applicant's/Registrant's Name & Address

Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015

Product

Paragon Molh Bars and Cakes

Ingredient p-Dichlorobenzene (PC Code 061501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5100	Bacterial Reverse Mutation	40521004	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568002	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568003	Chlorobenzene Producers Association	Old	In RED
870.5275	Sex-Linked Recessive Lethal Test	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521013	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521014	Chlorobenzene Producers Association	Old	In RED
870.5375	Chromosomal Aberration	43368448	Bayer Cropscience	Old	In RED
870.5375	Chromosomal Aberration	43868210	Bayer Cropscience	Old	In RED
870.5375	Cytogenetics-Chromatid Exchange	40521007	Chlorobenzene Producers Association	Old	In RED
870.5395	Mouse Micronucleus assay- Cytogenetics	43368447	Bayer Cropscience	Old	In RED
870.5395	In Vitro Mammalian Cytogenetics Test	40521012	Chlorobenzene Producers Association	Old	In RED
870.5450	Rodent Dominant Lethal Assay	40521011	Chlorobenzene Producers Association	Old	In RED
870.5550	Unscheduled DNA Synthesis	40521008	Chlorobenzene Producers Association	Old	In RED
870.5900	In Vitro Sister Chromatid Exchange Assay	40521007	Chlorobenzene Producers Association	Old	In RED

Signature

Name and Title

Dr. Matthew Brooks, Director

Date

12/10/2009




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 10, 2009		EPA Reg No./File Symbol 70305-2		Page 3 of 5	
Applicant's/Registrant's Name & Address Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015		Product Paragon Moth Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.6200	Acute Neurotoxicity Screening Battery	43350601	Chlorobenzene Producers Association	Old	In RED
870.6200	Subchronic Neurotoxicity Screening Battery	43350602	Chlorobenzene Producers Association	Old	In RED
870.7485	General Metabolism	41697801	Chlorobenzene Producers Association	Old	In RED
875.2400	Dermal Exposure	43716501	Recochem Inc.	Old	In RED
870.2500	Inhalation Exposure			Data Gap	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 12/10/2009




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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DATA MATRIX

Date December 10, 2009		EPA Reg No./File Symbol 70305-2		Page 4 of 5	
Applicant's/Registrant's Name & Address Paragon household Products 233 Clifton Blvd. Clifton NJ 07015		Product Paragon Moth Bars and Cakes			
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
158.165	Description of formulation process	47920901	Paragon Household Products	Own	
158.167	Discussion of impurities	47920901	Paragon Household Products	Own	
158.170	Preliminary Analysis	47920901	Paragon Household Products	Own	
157.175	Certified Limits	47920901	Paragon Household Products	Own	
158.180	Enforcement Analytical Method	47920901	Paragon Household Products	Own	
158.155	Product Identity and Composition	47920901	Paragon Household Products	Own	
158.160	Description of Materials used to produce the product	47920901	Paragon Household Products	Own	
158.162	Description of Production Process	47920901	Paragon Household Products	Own	
158.165	Description of formulation process-Registered Source		Paragon Household Products	Submitted	
158.155	Product Identity and Composition-Registered Source		Paragon Household Products	Submitted	
158.160	Description of Formulation Process-Registered Source		Paragon Household Products	Submitted	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 12/10/2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Date December 10, 2009

EPA Reg No./File Symbol 70305-2

Page 5 of 5

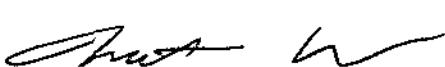
Applicant's/Registrant's Name & Address

Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015

Product

Paragon Moth Bars and Cakes

Ingredient p-Dichlorobenzene (PC Code 061501)

Guideline Reference Number	Guideline Study Name	MRI Number	Submitter	Status	Note
63-10	Disassociation Constant	47920901	Paragon Household Products	Own	
63-9	Vapor Pressure	47920901	Paragon Household Products	Own	
62-3[830.1670]	Color	47920901	Paragon Household Products	Own	
63-3 [830.6303]	Physical State	47920901	Paragon Household Products	Own	
63-4[830.6304]	Odor	47920901	Paragon Household Products	Own	
63-6[830.7220]	Boiling Point	47920901	Paragon Household Products	Own	
63-7[830.7300]	Density	47920901	Paragon Household Products	Own	
63-8[830.7840]	Solubility	47920901	Paragon Household Products	Own	
63-5	Melting Point	47920901	Paragon Household Products	Own	
63-12[830.7000]	pH	47920901	Paragon Household Products	Own	
63-13[830.6317]	Stability	47920901	Paragon Household Products	Own	
63-11	Octanol Water Partition	47920901	Paragon Household Products	Own	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 12/10/2009




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved DMB No. 2070-0060

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DATA MATRIX

Date October 29, 2009			EPA Reg No./File Symbol 70305-2		Page 1 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015			Product Para Moth Balls		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.1100	Acute Oral Tox	40521001	Chlorobenzene Producers Association	Old	In RED
870.1200	Acute Dermal Tox-Rabbit	40521001	Chlorobenzene Producers Association	Old	In RED
870.1300	Acute Inhalation Tox-Rat	41410901	Chlorobenzene Producers Association	Old	In RED
870.2400	Acute Eye Irritation	42205301	Chlorobenzene Producers Association	Old	In RED
870.2500	Acute Dermal Irritation	42205302	Chlorobenzene Producers Association	Old	In RED
870.2600	Skin Sensitization-Guinea Pig	42205303	Chlorobenzene Producers Association	Old	In RED
870.3150	90 Day Oral Toxicity-Rat	43988801	Monsanto Company	Pay	In RED
870.3200	21-Day Dermal Toxicity-Rat	41315001	Chlorobenzene Producers Association	Old	In RED
870.3465	90-Day Inhalation Toxicity-Dog	41822801	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rat	42619601	Chlorobenzene Producers Association	Old	In RED
870.3700	Prenatal Development Toxicity-Rabbit	40568001	Chlorobenzene Producers Association	Old	In RED
870.3800	Reproduction and Fertility Effects-Rat	41108801	Chlorobenzene Producers Association	Old	In RED
830.4100	Chronic Toxicity-Dog	43988802	Monsanto Company	Pay	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Rat	40521005	Chlorobenzene Producers Association	Old	In RED
870.4300	Combined Chronic Feeding/Carcinogenicity-Mouse	40521005	Chlorobenzene Producers Association	Old	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/29/2009

*Superseded
by 497 dated
10/10/2009*




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved DM8 No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date October 29, 2009			EPA Reg No./File Symbol 70305-2		Page 2 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015			Product Para Moth Balls		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5100	Bacterial Reverse Mutation	40521004	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568002	Chlorobenzene Producers Association	Old	In RED
870.5100	Bacterial Reverse Mutation	40568003	Chlorobenzene Producers Association	Old	In RED
870.5275	Sex-Linked Recessive Lethal Test	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521007	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521013	Chlorobenzene Producers Association	Old	In RED
870.5300	Cytogenetics-Mouse Lymphoma Mutagenic Assay	40521014	Chlorobenzene Producers Association	Old	In RED
870.5375	Chromosomal Aberration	43368448	Bayer Cropscience	Old	In RED
870.5375	Chromosomal Aberration	43868210	Bayer Cropscience	Old	In RED
870.5375	Cytogenetics-Chromatid Exchange	40521007	Chlorobenzene Producers Association	Old	In RED
870.5395	Mouse Micronucleus assay- Cytogenetics	43368447	Bayer Cropscience	Old	In RED
870.5395	In Vitro Mammalian Cytogenetics Test	40521012	Chlorobenzene Producers Association	Old	In RED
870.5450	Rodent Dominant Lethal Assay	40521011	Chlorobenzene Producers Association	Old	In RED
870.5550	Unscheduled DNA Synthesis	40521008	Chlorobenzene Producers Association	Old	In RED
870.5900	In Vitro Sister Chromatid Exchange Assay	40521007	Chlorobenzene Producers Association	Old	In RED
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/29/2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved DMB No. 2070-0060

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DATA MATRIX

Date October 29, 2009

EPA Reg No./File Symbol 70305-2

Page 3 of 5

Applicant's/Registrant's Name & Address

Paragon Household Products 233 Clifton Blvd. Clifton NJ 07015

Product

Para Moth Balls

Ingredient p-Dichlorobenzene (PC Code 061501)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.6200	Acute Neurotoxicity Screening Battery	43350601	Chlorobenzene Producers Association	Old	In RED
870.6200	Subchronic Neurotoxicity Screening Battery	43350602	Chlorobenzene Producers Association	Old	In RED
870.7485	General Metabolism	41697801	Chlorobenzene Producers Association	Old	In RED
875.2400	Dermal Exposure	43716501	Recochem Inc.	Old	In RED
870.2500	Inhalation Exposure			Data Gap	In RED

Signature

Name and Title

Dr. Matthew Brooks, Director

Date

10/29/2009




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date October 29, 2009			EPA Reg No./File Symbol 70305-2		Page 4 of 5
Applicant's/Registrant's Name & Address Paragon household Products 233 Clifton Blvd, Clifton NJ 07015			Product Para Moth Balls		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
158.165	Description of formulation process		Paragon Household Products	Submitted	
158.167	Discussion of impurities		Paragon Household Products	Submitted	
158.170	Preliminary Analysis		Paragon Household Products	Submitted	
157.175	Certified Limits		Paragon Household Products	Submitted	
158.180	Enforcement Analytical Method		Paragon Household Products	Submitted	
158.155	Product Identity and Composition		Paragon Household Products	Submitted	
158.160	Description of Materials used to produce the product		Paragon Household Products	Submitted	
158.162	Description of Production Process		Paragon Household Products	Submitted	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/29/2009

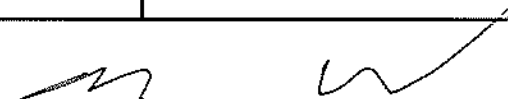


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved DMB No. 2070-0060

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DATA MATRIX

Date October 29, 2009			EPA Reg No./File Symbol 70305-2		Page 5 of 5
Applicant's/Registrant's Name & Address Paragon Household Products 233 Clinton Blvd. Clinton NJ 07015			Product Para Moth Balls		
Ingredient p-Dichlorobenzene (PC Code 061501)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
63-10	Disassociation Constant		Paragon Household Products	Submitted	
63-9	Vapor Pressure		Paragon Household Products	Submitted	
62-3[830.1670]	Color		Paragon Household Products	Submitted	
63-3 [830.6303]	Physical State		Paragon Household Products	Submitted	
63-4[830.6304]	Odor		Paragon Household Products	Submitted	
63-6[830.7220]	Boiling Point		Paragon Household Products	Submitted	
63-7[830.7300]	Density		Paragon Household Products	Submitted	
63-8[830.7840]	Solubility		Paragon Household Products	Submitted	
63-5	Melting Point		Paragon Household Products	Submitted	
63-12[830.7000]	pH		Paragon Household Products	Submitted	
63-13[830.6317]	Stability		Paragon Household Products	Submitted	
63-11	Octanol Water Partition		Paragon Household Products	Submitted	
Signature 			Name and Title Dr. Matthew Brooks, Director		Date 10/29/2009



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
Paragon Household 233 Clifton Blvd. Clifton NJ 07015

EPA Registration Number/File Symbol
70305-2

Active Ingredient(s) and/or representative test compound(s)
p-Dichlorobenzene

Date
10/29/2009

General Use Pattern(s) list all those claimed for this product using 40 CFR Part 158)
Indoor, nonfood

Product Name
Para Moth Balls

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

(Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements)

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

10/29/2009

Typed or Printed Name and Title

Matthew Brooks, Regulatory Consultant



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
(703) 266-4377 Fax

479413-00

December 10, 2009

Document Processing Desk
Office of Pesticide Programs (7508C)
One Potomac Yard
2777 S. Crystal Dr.
Arlington VA 22202

Attn: Dan Peacock/John Hebert/ PM19
Registration Division

**Re: Amendment to current registration of Para Moth Balls –rename to
Paragon Moth Bars and Cakes – Addition of registered and
unregistered source of active ingredient
Submission of product chemistry report.
EPA Registration Number 70305-2**

Dear Mr. Hebert:

On behalf of Paragon Household Products (233 Clifton Blvd., Clifton NJ 07015), Ag-Chem Consulting LLC is hereby submitting the following product chemistry data, formatted in accordance with Pesticide Registration notice 86-5, in support of the above pesticide product application.

Guideline	MRID	Study Title
PAG 158.150 – 158.190 OPPTS Series 830 (61, 62, 63 & 64)	47941301	Paragon Moth Bars and Cakes, Product Chemistry, Group A: Product Identity, Composition and Analytical Test Guidelines and Group B: Physical and Chemical Properties Test Guidelines , PAR002

Please feel free to contact me at 703-266-0128 if you have any questions concerning this submission.

Sincerely,

Matthew W. Brooks, Ph.D.
Ag-Chem Consulting LLC.
An Authorized Representative of Paragon Household Products



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 3, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

AG-CHEM CONSULTING
PARAGON HOUSEHOLD PRODUCTS INC
12208 QUINQUE LANE
CLIFTON, VA 20124-

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 30-NOV-09. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

479209-00

November 3, 2009

To: John Hebert
Product Manager 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: Amendment to Para Moth Balls
EPA Registration #70305-2

Dear Mr. Hebert;

Ag-Chem Consulting, on behalf of Paragon Household Products (233 Clifton blvd., Clifton NJ 07015) hereby submits the following application to amend the above product. Paragon wishes to:

- 1- Change the shape of the final product from balls to cakes and bars.
- 2- Add various fragrances
- 3- Add an unregistered source of active ingredient

Paragon is working with HBC Chemicals and is using the same source of material for its active ingredient. The difference is that paragon is forming cakes and bars instead of balls.

Included in support of this registration are:

- An application;
- A Confidential Statement of Formula with alternates
- A Data Matrix;
- A Certification with respect to citation of data form for the acute toxicology studies and generic p-dichlorobenzene data requirements.
- One copy of the revised label

Additionally, under separate cover, we have submitted the appropriate product chemistry. We believe this action should be coded under PRIA II as R340, amendment requiring data review within RD. We have prepaid a fee of \$3,444.

As always I look forward to working with you on this registration. Please do not hesitate to contact me at 703-266-0128 should you require additional information.

Very Sincerely,

Matthew Brooks
Director, Ag-Chem Consulting LLC
An Authorized Representative for Paragon Household Products

47920901

Para Moth Balls, Product Chemistry,
Group A: Product Identity, Composition and
Analytical Test Guidelines and Group B: Physical
and Chemical Properties Test Guidelines



Ag-Chem Consulting
Pesticide Science and Registration
12208 Quinque Lane, Clifton VA 20124
(703) 266-0128 mwbrooks01@yahoo.com
703-266-4377 Fax

November 3, 2009

To: John Hebert
Product Manager 19
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Yard
Arlington VA 22202-4501
Subject: Amendment to Para Moth Balls
EPA Registration #70305-2

Dear Mr. Hebert;

Ag-Chem Consulting, on behalf of Paragon Household Products (233 Clifton blvd., Clifton NJ 07015) hereby submits the following application to amend the above product. Paragon wishes to:

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Very Sincerely,

Matthew Brooks
Director, Ag-Chem Consulting LLC
An Authorized Representative for Paragon Household Products



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Paragon Household Products Inc. / 70305-2	2. EPA Product Manager John Hebert	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Paragon Household Products Inc. / PARA MOTH BALLS	PM# 19	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(B)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Amendment to revise product from mothball to moth cakes and bars and add scents and to add unregistered source of active ingredient.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 10 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dr. Matthew Brooks		Title Director, Ag-Chem Consulting		Telephone No. (Include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) 207
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Matthew Brooks		5. Date 10/29/2009			

12/13/11

MATERIAL TO BE ADDED TO JACKET

REG #

70305-1 ; 70305-2

Description:

Notification: Additional brand

Name

check all that apply		Send to CSC
<input type="checkbox"/>	new stamped accepted label	
<input type="checkbox"/>	new CSF	
<input checked="" type="checkbox"/>	notification	

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's

Name:

Anthony Gilbert

Date:

10/1/11

Phone:

308-8728

Division:

RD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Raymond E. McCreary
Paragon Household Products, Inc.
P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015

SEP 24 2007

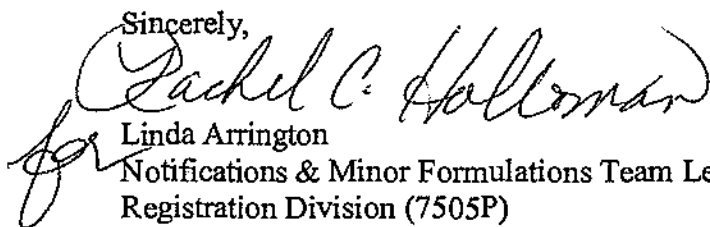
Subject: Notification of Additional Brand Name
EPA Reg. No. 70305-1 & 70305-2
"PARA MOTH BALLS" & "CEDAR SCENTED PARA MOTH BALLS"
ABN: PARA MOTH BAR
Submission: July 27, 2007

Dear MR. McCreary:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated July 7, 2007 for the above mentioned products. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10 under "alternate brand names" (II-A). The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249.

Sincerely,



Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



P.O. Box 2169
233 Clifton Boulevard
Clifton, NJ 07015
Tel: (973) 591-0777
Fax: (973) 591-0770

July 27, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
401 M Street S.W.
Washington, D.C. 20460-0001

RE: Application for Notification
EPA Reg. Nos. 70305-1 & 70305-2

Dear Sir/Madam:

Please find enclosed Application for Notification forms (EPA Form 8570-1), as per the provisions of the PR notice 98-10, and in accordance with 40 CFR 152.46.

Specifically, as provided for by the above mentioned PR Notice 98-10, we notify the Agency the addition of Alternate Brand Names for our products "PARA MOTH BALLS", EPA Reg. No. 70305-1, and "CEDAR SCENTED PARA MOTH BALLS", EPA Reg. No. 70305-2. Enclosed also are copies of the labels for the two products reflecting the additional brand names.

Should there be any questions regarding this matter, please do not hesitate to call me at 973-591-0777.

Sincerely,


Raymond E. McCreary, President
Paragon Household Products, Inc.

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OCT 17 2007

Mr. Raymond E. McCreary
Product Registration
Paragon Household Products, Inc.
P.O. Box 2169, 233 Clifton Blvd.
Clifton, NJ 07015

SUBJECT: Application for Pesticide Notification (PRN 98-10)
Request General Label Change and Directions for Use
EPA Reg. No. 70305-2
Application Dated August 31, 2007

Dear Mr. McCreary:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 08/31/07 for the above product. The Registration Division (RD) has conducted a preliminary screen of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Theresa A. Stone

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Front Panel

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth ~~Balls~~ Bar
Cedar Scented

TO KILL CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES
IN AIR-TIGHT CONTAINERS AND STORAGE CLOSETS

ACTIVE INGREDIENT:

Paradichlorobenzene 99.9%

INERT INGREDIENTS: 0.1%

TOTAL 100.0%

KEEP OUT OF REACH OF CHILDREN

WARNING

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-2
EPA Est. No. 70305-NL-01

Left and Right Side Panels

PARAGON
HOUSEHOLD PRODUCTS INC.

Para
Moth
~~Balls~~ Bar

KILLS CLOTHES MOTHS (Larvae and Adults)
AND CARPET BEETLES

FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS

PARAGON
HOUSEHOLD PRODUCTS INC.

233 CLIFTON BLVD.
CLIFTON, NJ 07015

Back Panel

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. If symptoms persist, get medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above, at the following rates:

Pounds of Product	Area of Tightly Enclosed Space
-------------------	--------------------------------



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70305-2	2. EPA Product Manager Daniel C. Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CEDAR SCENTED PARA MOTH BALLS	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products, Inc. P.O. Box 2169, 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternate Brand Name "CEDAR SCENTED PARA MOTH BAR" per PR Notice 98-10.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted					
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Raymond E. McCreary	Title President	Telephone No. (Include Area Code) 973-591-0777
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		(i. Date Application Received (Stamped)
2. Signature 	3. Title President	
4. Typed Name Raymond McCreary	5. Date July 25, 2007	

SECTION - II (Cont'd)

“This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of the U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.”

1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70305-2	2. EPA Product Manager Daniel C. Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) CEDAR SCENTED PARA MOTH BALLS	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) Paragon Household Products Inc. P.O. Box 2169, 233 Clifton Blvd. Clifton, NJ 07015 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of minor label changes concerning Directions for Use as per PR Notice 98-10. (Section II continues on the attachment)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> Text <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Raymond E. McCreary	Title President	Telephone No. (Include Area Code) 973-591-0777
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		5. Date Application Received (Stamped)
2. Signature 	3. Title	
4. Typed Name Raymond E. McCreary	5. Date August 31, 2007	

SECTION - II (Cont'd)

“This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of the 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.”

Front Panel

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para
Moth Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

NET WT.10 oz (283.5 g)

ACTIVE INGREDIENT:

Paradichlorobenzene.....100%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

SEE BACK PANEL FOR ADDITIONAL PRECAUTIONS

EPA Reg. No. 70305-3
EPA Est. No. 70305-NJ-01

Left and Right Side Panels

**PARAGON
HOUSEHOLD PRODUCTS INC.**

**Para Moth
Flakes**

**KILLS MOTHS AND
CARPET BEETLES**

**FRESHENS, PROTECTS AND DEODORIZES
CLOTHING AND FABRICS**

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 CLIFTON BLVD.
CLIFTON, NJ 07015**

Back Panel

PRECAUTIONARY STATEMENTS **HAZARD TO HUMANS AND DOMESTIC ANIMALS**

Causes substantial but temporary eye injury. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear safety glasses. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

FIRST AID

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency call **1-800-222-1222**.

STORAGE AND DISPOSAL

Storage: Store only in original container, in a cool dry place inaccessible to children and pets.

Disposal: Do not reuse empty container (or packaging). Securely wrap in newspaper and discard in trash.

DIRECTIONS FOR USE:

It is a violation of the Federal Law to use this product
in a manner inconsistent with its labeling

TO KILL CLOTHES MOTH AND CARPET BEETLES

Use Restrictions: To kill clothes moths (larvae and adults) and carpet beetles in clean, air-tight containers (e.g. chests and trunks), garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. For use only on cloth containing wool or wool blends in fabrics.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags and closets listed above at the

following rates:

Pounds of Product	Area of Tightly Enclosed Space
1/4	Average Garment Bag
1/3	Large Trunk
1	50 cubic feet (Small Closet)

For larger closets, multiply the height, width, and depth of the space and divide by 50 to determine the number of pounds of product needed. For example, a closet 8 feet high, 2 4 feet wide, and 3 feet deep (i.e. 96 cubic feet) would need about 2 pounds of product ($96/50=1.9$).

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets 2 times a year.

**PARAGON
HOUSEHOLD PRODUCTS INC.
233 Clifton Blvd.
Clifton, NJ 07015**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY
AND POLLUTION PREVENTION

HBC Chemical LLC
c/o
Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

JUN 17 2014

Subject: Amendment to add an additional Alternate Confidential Statement of Formula (CSF)
EPA Registration No. 70305-2
Primary Brand Name: Paragon Moth Bars
Decision number: 491818
Submission Date: May 12, 2014

Dear Mr. Brooks,

The CSF referred to above, submitted in connection with registration under FIFRA, is not acceptable for the following reasons:

- An inert ingredient in your proposed Alternate CSF, is not in the Agency's database. You must submit compositional information for the ingredient from the manufacturer, on the manufacturer's letterhead, including: chemical name(s), CAS number(s), and % in formulation by weight of all components (component total must be equal to 100%).

No further processing of this application will occur until this information is submitted for review under a separate application. If you have any questions, please contact me at 703-347-0235 or benbow.gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith F. Laws".

Meredith F. Laws
Branch Chief
Insecticide-Rodenticide Branch
Registration Division (7505P)

AG-CHEM CONSULTING

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 MWBROOKS@AG-CHEM.COM
(703) 266-4377 FAX

May 12, 2014

Reuben Baris PM #7
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**Subject: Amendment to add additional alternate CSF
EPA Registration Number 70305-2**

Dear Mr. Baris:

Ag-Chem Consulting, on behalf of HBC Chemical LLC, submits the following amendment to add alternate 5 CSF. We are adding the fragrance of [REDACTED] All the ingredients used to make this scent are cleared inerts.

Included with this amendment are:
One application 8570-1
Two copies of the proposed CSF
One copy of the MSDS from the supplier [REDACTED]
which lists the ingredients and CAS Numbers

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

72

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for HBC Chemical LLC

Product ingredient source information may be entitled to confidential treatment

Inert ingredient information may be entitled to confidential treatment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number HBC Chemical LLC/ 70305-2	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> Nonrestricted <input type="checkbox"/> Restricted
4. Company/Product (Name) HBC Chemical LLC / Paragon Moth Bars	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

Amendment to add additional alternate CSF.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz.	No. per container 6-12	If "Yes" Package wgt.	No. per container
				<input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dr. Matthew Brooks		Title Director, Ag-Chem Consulting		Telephone No. (Include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) <div style="text-align: right; font-size: 24pt;">224</div>
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Matthew Brooks		5. Date 5-12-14			

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature: R Baris

Date: 5/16/14

PM #: 7

EPA Reg. Number: 70305-2

EPA Receipt Date: 5/14/14

	YES	NO	DATE
1 Application Form (EPA Form 8570-1) - signed?	✓		
2 Confidential Statement of Formula (EPA Form 8570-29) - signed?	✓		
3 Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?			
4 Formulator's Exemption Statement (EPA Form 8570-27) - signed?			
5 Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?			
a) Selective Method?			
b) Cite-All Method?			
c) Public copy of Matrix provided? See PR Notice 98-5			
6 Is Label included? (5 copies)			
a) Electronic Label submitted?			
<p>Comments:</p> <p>Needs next screen.</p> <p>Page 4181 not cleared.</p> <p>INERTS NOT APPROVED. SEE INERT STATUS FORM ATTACHED TO CSF</p> <p style="text-align: right;">R Baris 5-30-2014</p>			



Fee for Service

{9523194~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 7

Receipt No.

S- 952319

EPA File Symbol/Reg. No.

70305-2

Pin-Punch Date:

5/14/2014

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☒ Uncleared Inert in Product

Reviewer: Peter A. Noble

Date: 5/15/14

Remarks:

*looks like ~~new~~ source of air not registered, but they aren't adding a source,
so mm- PRA*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 15, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MATTHEW BROOKS, PH.D.
AG-CHEM CONSULTING
HBC CHEMICAL, LLC
12208 QUINQUE LANE
CLIFTON, VA 20124-

PRODUCT NAME: PARAGON MOTH BARS
COMPANY NAME: HBC CHEMICAL, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 70305-2
EPA RECEIPT DATE: 05/14/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 305-7356.

Sincerely,

A handwritten signature in black ink, appearing to be "S. Brooks".

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY
AND POLLUTION PREVENTION

MAY 5 2014

HBC Chemical LLC
c/o
Matthew Brooks
Ag-Chem Consulting
12208 Quinque Lane
Clifton, VA 21024

Subject: Amendment to add an Alternate Confidential Statement of Formula (CSF)
EPA Registration No. 70305-2
Primary Brand Name: Paragon Moth Bars
Submission Date: April 2, 2014

Dear Mr. Brooks:

The above CSF submitted under FIFRA, as amended, is not acceptable for the following reasons:

- An inert ingredient in your proposed Alternate CSF, is not in the Agency's database. You must submit compositional information for this ingredient from the manufacturer, on the manufacturer's letterhead, including: chemical name(s), CAS number(s), and % in formulation by weight of all components (component total must be equal to 100%).

No further processing of this application will occur until this information is submitted for review under a separate application. If you have any questions, contact Gene Benbow at (703) 347-0235 or via email at benbow.gene@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Laws", with a stylized flourish at the end.

for Meredith Laws
Branch Chief
Insecticide-Rodenticide Branch
Registration Division (7505P)



AG-CHEM CONSULTING

PESTICIDE SCIENCE AND REGISTRATION
12208 QUINQUE LANE, CLIFTON VA 20124
(703) 266-0128 MWBROOKS@AG-CHEM.COM
(703) 266-4377 FAX

April 2, 2014

Reuben Baris PM #7
Registration Division (7505P)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

**Subject: Amendment to add additional alternate CSF
EPA Registration Number 70305-2**

Dear Mr. Baris:

Ag-Chem Consulting, on behalf of HBC Chemical LLC, submits the following amendment to add alternate 5 CSF. We are adding the fragrance of [REDACTED] All the ingredients used to make this scent are cleared inerts.

Included with this amendment are:
One application 8570-1
Two copies of the proposed CSF

Should you have any questions or require additional information, please do not hesitate to contact me at 703-266-0128.

Sincerely,

Dr. Matthew Brooks
Director, Ag-Chem Consulting
An Authorized Representative for HBC Chemical LLC

Inert ingredient information may be entitled to confidential treatment



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identification Number

Application for Pesticide - Section I

1. Company/Product Number HBC Chemical LLC/ 70305-2	2. EPA Product Manager Reuben Baris	3. Proposed Classification <input checked="" type="checkbox"/> Nono <input type="checkbox"/> Restricted
4. Company/Product Name HBC Chemical LLC / Paragon Moth Bars	PM# 7	
5. Name and Address of Applicant (Include ZIP Code) HBC Chemical LLC c/o Ag-Chem Consulting 12208 Quinque Lane Clifton, VA 21024 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Mo Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. If for section I and Section II.

Amendment to add additional alternate CSF.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Specify) plastic bag in box	
* Certification must be submitted		If "Yes" Unit Packaging wgt. 2-24 oz	No. per container 6-12	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 4,5,7,10,12,14,16,24 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> printed on box	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Dr. Matthew Brooks		Title Director, Ag-Chem Consulting		Telephone No. (include Area Code) 703-266-0128	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped) <div style="text-align: right; font-size: 1.2em;">230</div>
2. Signature 		3. Title Regulatory Consultant			
4. Typed Name Matthew Brooks		5. Date 4-2-14			

INER CLEARANCE STATUS FORM

Reviewer Name: <u>Robert Crosser</u>	Request date: <u>4-3-2014</u>
Tel: <u>(703) 347-8516</u>	RGO: <u>IIAB/RD</u> CUBE: <u>57982</u> MAIL CODE: <u>7505P</u>

A: RECOMMENDATION:

<u>SEE INFORMATION INGREDIENT 1</u>

B. PESTICIDE PRODUCT INFORMATION:

EPA Reg. No/File Symbol: <u>70305-2</u>	Product Name: <u>PARAGON MOTH BARS</u>
Registrant: <u>HBC CHEMICAL LLC</u>	Date on CSF: <u>APR 1, 2014</u> Food-Use Pesticide: [] Yes <input checked="" type="checkbox"/> No

C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s)					
	910	920	930	940	950	960
Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments: <u>TRADE NAME NOT FOUND IN EPA DATABASE. SUPPLIER MUST SUPPLY COMPOSITIONAL INFORMATION ON THEIR LETTER HEAD</u>						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Ingredient No. 3

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Ingredient No. 4

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Completed By: Robert Crosser

Date Completed: 4/23/14

Inert ingredient information may be entitled to confidential treatment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

April 4, 2014

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MATTHEW BROOKS, PH.D.
AG-CHEM CONSULTING
HBC CHEMICAL, LLC
12208 QUINQUE LANE
CLIFTON, VA 20124-

PRODUCT NAME: PARAGON MOTH BARS
COMPANY NAME: HBC CHEMICAL, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 70305-2
EPA RECEIPT DATE: 04/03/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 7, at (703) 305-7356.

Sincerely,

A handwritten signature in black ink, appearing to be "S. J. ...", written over a horizontal line.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature:

R Baris

Date: 4/10/14

PM #:

7

EPA Reg. Number:

705/05-2

EPA Receipt Date:

1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?	<input checked="" type="checkbox"/>		
3	Certification with Respect to Citation of Data (EPA Form 8570-34) - signed?			
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			
5	Data Matrix (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?			
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label included? (5 copies)			
	a) Electronic Label submitted?			
<p>Comments:</p> <p>needs nerts clearance. unregistered source.</p> <p>NOT ACCEPTED SINCE NERT NOT FOUND IN EPA DATABASE See Inert status Form attached to the CSF Liam 4-23-2014</p>				

INERT INGREDIENT STATUS FORM

Reviewer Name: Roger Chesser			Request date: 5/14/2014
Tel: 703-347-8516	RD/IIAB	CUBE: S-7982	

A. COMMENTS:

Inert Ingredient/Mixture not in the Agency database as an approved inert. See under Ingredient No.1 for details.
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B. PESTICIDE PRODUCT INFORMATION:

Receipt Number: S-952319	Date on CSF: 4/1/2014	Food-Use Pesticide: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
EPA Reg. No/File Symbol: 70305-2	Formulation: Alt# 5	
Product Name: Paragon Moth Bars (Rose Scent)		

C. INGREDIENT INFORMATION:

Ingredient No.1	Tolerance Exemption(s) ¹					
	910	920	930	940	950	960
Chem. Name: Proprietary mixture						
Trade Name: XXXXXXXXXX						
CAS Reg. No.: n/a						
Comments: Mixture/Trade name not in the Agency database. Need full compositional information from the manufacturer which includes CAS Reg. Nos., %w/w (add up to a total of 100%), and chemical names for all ingredients in the mixture.						

Ingredient No. 2

Chem. Name:						
Trade Name:						
CAS Reg. No.:						
Comments:						

Ingredient No. 3

Chem. Name:						
Trade Name:						
CAS Reg. No.:						

Completed By: Roger Chesser

Date Completed: 5/30/2014

¹Language from the Code of Federal Regulations (40 CFR 180, subpart D):

40 CFR 180.910: Inert ingredients used pre- and post-harvest; 40 CFR 180.920: Inert ingredients used pre-harvest; 40 CFR 180.930: Inert ingredients applied to animals; 40 CFR 180.940: Tolerance exemptions for active and inert ingredients for use in antimicrobial formulations; 40 CFR 180.950: Tolerance exemptions for minimal risk active and inert ingredients; and 40 CFR 180.960: Polymers.

